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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

MAY 29 2001

To: Addressees

Re: Malvern TCE Superfund Site  
**Opportunity to Participate in *De Minimis* Settlement**

Dear Sir or Madam:

This letter notifies you that the United States Environmental Protection Agency ("EPA") is now offering certain parties the opportunity to enter into a proposed second round *de minimis* settlement pursuant to Section 122(g) of CERCLA, 42 U.S.C. § 9622(g) and that you may qualify for this *de minimis* settlement in connection with the Site. A list of parties eligible to participate in this settlement is enclosed as Attachment "A."

EPA previously sent you (or your corporate predecessor) a Notice Letter with respect to the Site. This correspondence identified you as a potentially responsible party ("PRP") for the Site.

As explained in that previous letter, EPA has conducted and overseen activities at the Site in response to the release and/or threat of release of hazardous substances, pollutants and/or contaminants into the environment. In May 1999, EPA and 169 *de minimis* parties entered into an Administrative Order on Consent, which became effective September 28, 1999. EPA has recently learned that you intended to join that first round *de minimis* settlement for this Site; however, EPA's records do not reflect that this occurred. In light of this situation, EPA is providing a new document for you to sign, with most of the same terms as the prior document. However, the payment amount has been revised and updated to reflect increased costs at the Site, and the premium formulation and the reservation of rights by the United States has been revised to take into account EPA's current information regarding Site conditions. For our records, we are designating this as a second round *de minimis* settlement.

1. ***Site Background***

CERCLA, more commonly known as Superfund, has several key objectives including setting priorities for cleanup of the worst hazardous sites in the country, and, determining the parties potentially responsible for investigating, cleaning up or paying the costs of cleaning up such hazardous sites. These parties are referred to as "potentially responsible parties" or "PRPs."

On October 14, 1992, EPA included the Site on the National Priorities List ("NPL"), a list of the most serious uncontrolled or abandoned sites at which releases of hazardous substances have occurred or may occur. For a more detailed discussion of the Site background, please see Enclosure 1.

2. ***"De Minimis" Settlements***

This letter also serves as notice to the parties listed on Attachment "A," of the opportunity to participate in a second round *de minimis* settlement with EPA in connection with the Site. Based on EPA's review of the records pertaining to the Site, you appear to be responsible for a relatively small amount of hazardous substances at the Site. Therefore, you are being offered this opportunity to settle as a *de minimis* party.

Pursuant to CERCLA, 42 U.S.C. § 9601, *et seq.*, EPA has conducted and overseen a number of activities at the Site in response to the release and/or threat of release of hazardous substances, pollutants, and/or contaminants into the environment, described above and in Enclosure 1. CERCLA not only authorizes EPA to take actions at sites such as the Malvern TCE Superfund Site to protect public health, welfare, and the environment, it also permits EPA to request and require that parties who are responsible for the waste pay to clean up the Site.

Under Section 122(g) of CERCLA, EPA may offer special settlements to *de minimis* PRPs. Any party who settles its liability to the United States pursuant to this *de minimis* settlement will not be required to perform Site cleanup work. Instead, the *de minimis* settlor will pay an amount calculated by EPA to represent that party's proportionate share of costs already incurred and to be incurred at the Site, plus a premium accounting for, among other things, uncertainties in the costs of work not yet performed. In exchange for this cash payment, EPA will agree not to sue or take other civil action against the *de minimis* settlor with regard to this Site and will provide the *de minimis* settlor with contribution protection (see discussion on page 4), subject to the settlor's compliance with the terms of the settlement.

The enclosed Administrative Order by Consent ("Consent Order") (Attachment "B") sets forth the terms for concluding your liability to the United States for response costs incurred or to be incurred under CERCLA. EPA has released this Consent Order for your signature. This opportunity to settle under the terms described herein is being offered for a limited time. EPA will accept your signature on the Consent Order for **thirty (30) days** from receipt of this offer.

In order to assist you in your review of the specific terms of the Malvern TCE Superfund Site *de minimis* settlement offer, the following information is provided:

A. De Minimis Settlement Eligibility

1. Small Waste Contributors

PRPs may be eligible for *de minimis* settlements if such parties contributed a minimal amount of hazardous substances, in comparison to other hazardous substances at the Site. In addition, the toxicity or other hazardous effects of the hazardous substances contributed by a PRP to the Site must not be significantly greater than that of other hazardous substances at the Site.

2. Volumetric Ranking Summary

Small waste contributors eligible for *de minimis* settlement have been identified by EPA by utilizing volumetric ranking summaries prepared for the Site. EPA initially prepared two volumetric ranking summaries, a "Generator VRS" and a "Broker/Transporter VRS," dated November 30, 1998 (collectively referred to as "Summaries"). These Summaries are provided in Attachment "C." As will be described in greater detail below, a PRP is eligible to participate in this settlement if its volumetric contribution of hazardous substance to the Site is at or less than .75% of the total volume attributed to the Main Plant Area ("MPA") of the Site. EPA also has established a *de micromis* cutoff at 1.5 drums or less.

The attached Summaries were compiled using comprehensive Site documents, including invoices, bills of lading, shipping orders and manifests, obtained by EPA from Chemclene. The Summaries reflect revisions made by EPA to previous draft summaries as a result of EPA's review of ranking challenges received from PRPs. These Summaries also reflect EPA's research into whether certain PRP companies are still in existence. See Attachment "C," "Malvern TCE Volumetric Ranking Summaries Overview and Methodology" ("VRS Overview and Methodology") and "VRS Explanation Sheet," for additional information as to the methodology utilized and information contained in the Summaries.

There will be no further waste reallocation conducted for the purposes of this *de minimis* settlement.

The Summaries and the new Volumetric Ranking Summary for the Second Round *De Minimis* Settlement ("New VRS") provide, for each PRP, waste-in volume and percentage information for both the MPA and the Former Disposal Area ("FDA") at the Site. Since all PRP waste into the Site was received and processed by Chemclene in the MPA, EPA has set the *de minimis* settlement eligibility cut-off at or less than .75% of the total MPA waste volume. Generator PRPs should refer to the "MPA %" column contained in the Generator VRS in order to determine their MPA %. Broker/transporter PRPs should add their MPA % listed on both the Generator VRS and the Broker/Transporter VRS, in order to determine their total MPA %. See Attachment "C," "VRS Overview and Methodology," for additional information as to the information contained in the Generator VRS and Broker/Transporter VRS.

Since the preparation of the Summaries, EPA has incurred additional costs for activities at the Site. Consequently, EPA has prepared a New VRS that includes total volumetric information for both Generators and Broker/Transporters. The New VRS incorporates the new higher costs into its cost allocation for each eligible PRP. The New VRS reflects the total payment amounts for the *de minimis* parties eligible for this settlement and is provided as Attachment "D."

B. De Minimis Settlement Terms

1. De Minimis Settlement Payment

**In order to participate in this settlement, each *de minimis* PRP must agree to pay the amount listed next to its company in the "Total Payment" column on the New VRS (Attachment "D").**

The total payment amount represents each *de minimis* PRP's FDA and MPA percentage contribution towards past costs incurred by EPA at the Site and estimated future costs to clean up the Site, plus a premium payment. The premium payment of formulation of 50%, subject to a reopener, for this settlement offer has been determined based upon a variety of factors specific to both the Site and the settlement. In addition, for parties who were offered an opportunity to join in the original *de minimis* settlement, an additional 10% will be included in the premium.

In order to determine a *de minimis* PRP's total *de minimis* settlement payment, EPA has divided costs associated with the FDA and the MPA and calculated total payment amounts for each of these areas.

2. Covenant Not to Sue

EPA will provide each settling *de minimis* PRP with a covenant not to sue. This provision is a promise that EPA will not bring any future legal actions against you regarding the Site and the specific matters identified by the settlement, provided that EPA's information regarding the volume and toxicity of your wastes is correct.

3. Contribution Protection

EPA will provide each settling *de minimis* PRP with contribution protection. This provision offers you protection from being sued by other PRPs at the Site. Frequently, major waste contributors will sue small waste contributors to recover clean up costs. A *de minimis* settlement provides protection from such suits that extends to all issues covered by the settlement.

C. Information to Assist PRPs

1. Information about the Site

In addition to the information contained in this letter, key documents about the Site are available for your review at the following locations:

U.S. EPA- Region III  
Public Reading Room  
Ms. Anna Butch  
1650 Arch Street  
Philadelphia, PA 19107  
(215) 814-3157

Chester County Library  
400 Exton Square Parkway  
Exton, PA 19341  
(610) 363-0884

2. Other *De Minimis* Parties

In connection with the first round *de minimis* settlement some *de minimis* PRPs formed *de minimis* PRP groups as a result of previous activities at the Site. Those group representatives are as follows:

Philip L. Hinerman, Esq.  
Fox, Rothchild, O'Brien & Frankel, LLP  
2000 Market Street, 10<sup>th</sup> Floor  
Philadelphia, PA 19103-3291  
(215) 299-2000

Andrew P. Foster, Esq.  
Drinker Biddle & Reath LLP  
1345 Chestnut Street  
Philadelphia, PA 19109-3496  
(215) 928-2512

3. Other Site PRPs

EPA has identified PRPs at the Site that EPA has determined are not eligible for *de minimis* settlement and to whom this *de minimis* settlement offer has not been extended. These PRPs are those with an MPA % of greater than .75%. An address list, reflecting the names and addresses of all Site PRPs, including both *de minimis* and those not eligible for *de minimis*

settlement, is attached (Attachment "E"). Additional *de minimis* settlement offers may be made to other eligible PRPs in the future.

D. Form of the Settlement

This settlement offer is extended only to the addressees of this letter. You have thirty (30) days from the receipt of this offer to sign and return the enclosed Consent Order. Executed signature pages may be sent to the following:

Michael Frankel, Senior Paralegal (3RC41)  
U.S. Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103

Once the parties have signed the Consent Order, there will be a public comment period pursuant to Section 122(i) of CERCLA, 42 U.S.C. § 9622(i). In accordance with Section 122(i)(3) of CERCLA, 42 U.S.C. § 9622(i)(3), EPA may withdraw its consent to the Consent Order if comments received disclose facts or considerations that indicate that the Consent Order is inappropriate, improper, or inadequate. If the comments received do not require modification of, or EPA withdrawal from, the Consent Order, the effective date of the Consent Order shall be the date upon which EPA issues written notice to the Respondents.

If you already are involved in discussions with State or local authorities, engaged in voluntary action, or involved in a lawsuit regarding this Site, you should not interpret this letter as advising or directing you to restrict or to discontinue any such activities. You should, however, report the status of those discussions or activities in your letter to EPA. The factual and legal discussions contained in this letter are intended solely for notification and information purposes. They are not intended to be, and cannot be relied upon, as a final EPA position on any matter set forth herein.

EPA has determined that some of the companies receiving this letter may be small businesses under the Small Business Regulatory Enforcement and Fairness Act ("SBREFA"). Please see Attachment G to this letter. This information has been provided for informational purposes only pursuant to EPA policy, and is not intended to influence any PRP's decision to enter into settlement negotiations pursuant to this letter.

If you have any questions relating to the foregoing, you may call Carlyn Winter Prisk, Civil Investigator, at (215) 814-2625.

Sincerely,

A handwritten signature in black ink, appearing to read "Heather Gray Torres".

Heather Gray Torres, Esquire  
Associate Regional Counsel

Enclosures:

- |                |  |
|----------------|--|
| Enclosure 1 -  | Site Background  |
| Attachment A - | List of <i>De Minimis</i> Parties receiving this settlement offer  |
| Attachment B - | Draft Administrative Order on Consent for <i>De Minimis</i> Parties  |
| Attachment C - | Generator Volumetric Ranking Summary (with attached<br>Volumetric Ranking Summary Explanation Sheet)<br>Broker/Transporter Volumetric Ranking Summary (with attached<br>Volumetric Ranking Summary Explanation Sheet)<br>Volumetric Ranking Summaries Overview and Methodology |
| Attachment D - | New Volumetric Ranking Summary for the Second Round De<br>Minimis Settlement ("New VRS") (with attached Volumetric<br>Ranking Summary Explanation Sheet)   |
| Attachment E - | Comprehensive Mailing List (All Site PRPs)   |
| Attachment F - | Site Documents<br>Comprehensive Transaction Reports  |
| Attachment G - | Small Business Regulatory and Enforcement Fairness Act<br>Information Sheet  |

## Enclosure 1

The Malvern TCE Superfund Site ("Site") is located at and near 258 N. Phoenixville Pike, Malvern, East Whiteland Township, Pennsylvania.

From 1952 until 1992, Chemclene Corporation sold and reclaimed industrial cleaning solvents, including trichloroethene ("TCE"); 1,1,1-trichloroethane ("1,1,1-TCA"); perchloroethylene ("PCE," also called tetrachloroethene); and methylene chloride ("MEC"). These solvents were used by local industries for degreasing metal parts and other cleaning purposes. Chemclene used a distillation process to remove impurities from the chlorinated solvents. The distilled solvents were then resold to customers for reuse, or resold to other customers. Chemclene utilized two areas of the Site as part of its operations, the Main Plant Area ("MPA") and the Former Disposal Area ("FDA").

The end products of processing waste solvents are the reclaimed solvents and chlorinated still bottoms. The chlorinated waste solvents are listed hazardous wastes pursuant to the Resource Conservation and Recovery Act ("RCRA") and, therefore, the resulting still bottoms are listed hazardous waste. Prior to 1975, Chemclene reportedly buried drums containing the still bottom sludges from the distillation process in the Former Disposal Area/Mounded Area ("FDA"), approximately 1,900 feet southwest of the main plant. The FDA consists of two unlined earthen pits, each approximately 30 feet by 50 feet by 15 feet deep. This area is currently secured by an 8-foot high chain link fence. The Mounded Area, located on the western edge of the FDA, is approximately 8 feet wide by 150 feet long.

Chemclene's activities at the Site have been linked to the presence of volatile organic contaminants in the ground water and soil at the MPA and the FDA and the groundwater of the adjacent Spring Ridge Property. These contaminants include TCE, PCE, 1,1,1-TCA, MEC, 1,1-DCE, among others, and are listed as hazardous substances under 40 C.F.R. § 302.4.

In the spring of 1980, TCE was detected in groundwater from several wells in the vicinity of the Chemclene facility. At this time, Chemclene Corporation began sampling domestic wells in the immediate vicinity of the property. Private domestic wells and on-Site monitoring wells were sampled by Pennsylvania's Department of Environmental Resources ("PADER"), now known as the Department of Environmental Protection ("PADEP"), and Chemclene in June 1980 and July 1981. Analytical results revealed contamination of the underlying aquifer with chlorinated ethenes and related compounds. TCE was detected in wells at concentrations up to 12,600 micrograms per liter ("µg/l"), far exceeding the Maximum Contaminant Level ("MCL") of 5.0 µg/l. The Site was listed on the Superfund National Priorities List ("NPL") in September 1983. The contaminated home wells were located south of the FDA, with several located in the Hillbrook Circle residential development. Chemclene furnished activated carbon filter units to twenty (20) residential wells within the Hillbrook Circle Development and conducted periodic sampling of home wells in accordance with its Domestic Well Management Plan until November 1994. In February 1995, EPA assumed control of maintenance activities of the carbon filter units and periodic sampling of the home wells, after it was determined that Chemclene was not following the procedures outlined in its Domestic Well Management Plan. In August 1995,



several of the filter systems were upgraded by EPA in response to analytical results from residential well samples that showed contamination was passing through the existing filters into the homes.

In addition to the installation of carbon filters, Chemclene conducted removal actions following the detection of soil and groundwater contamination in 1980. Debris and approximately 300 drums were removed from the FDA excavations, in a prolonged removal effort from 1981 to 1984. Soils underlying the FDA were excavated to a depth of 15 feet and transported for disposal at a RCRA permitted disposal facility. Additional drums were removed from the Mounded Area in late 1990; however, contaminated soil was left in place.

Four underground storage tanks ("UST"s) were removed from the MPA in 1986. Soil samples collected from below the excavation grade of the tanks exhibited elevated concentrations of TCE, PCE, and 1,1,1-TCA. In addition, elevated levels of volatile organic compounds ("VOCs") were detected in soil gas samples collected outside the distillation building in the MPA. These contaminant levels are believed to be related to Chemclene's past practices of discharging contaminated condensate from the recycling distillation process directly onto the ground surface.

As an operating facility, Chemclene entered into a RCRA Corrective Action Order with EPA in 1987. A RCRA Facilities Investigation ("RFI") Work Plan was approved for the Site in 1989. In July 1992, Chemclene withdrew its RCRA Part B Application as a treatment and storage facility, and to EPA's knowledge stopped accepting waste solvents for reclamation.

Chemclene failed to complete the RFI and implement interim corrective measures. As a result, EPA began considering the Site under the Superfund remedial program in November 1993. All existing data was compiled and a report was developed entitled Data Summary Report, April 1995. Based on EPA's review of the existing information, data gaps were identified and EPA was unable to conduct a Human Health or Ecological Risk Assessment. Accordingly, EPA conducted a Remedial Investigation ("RI") to complete the necessary data gathering at the Site. The RI was completed in January 1997 and the Feasibility Study ("FS") in June 1997. The Proposed Plan for a comprehensive Site clean up was issued in June 1997. In November 1997, EPA issued a Record of Decision ("ROD") selecting a final remedy for cleanup of the Site. Available information indicates that Chemclene ceased operations in the Fall of 1999.

In April 1998, EPA notified approximately 250 generator and transporter potentially responsible parties ("PRPs") of their eligibility for a potential Superfund *de minimis* settlement offer regarding the Site. Additionally, in May 1998, EPA issued Special Notice Letters to approximately 40 non-*de minimis* potentially responsible parties which notified them of their opportunity to resolve their liability with respect to the Site.

In May 1999, EPA and 169 *de minimis* parties entered into an Administrative Order on Consent, which became effective September 28, 1999. In December 1999, the U.S. District Court for the Eastern District of Pennsylvania entered a Consent Decree between EPA and 35

non-*de minimis* parties. Among other things, the 35 non-*de minimis* parties agreed to implement the Remedial Design and Remedial Activity specified in the November 1997 ROD.

**Malvern TCE Site De Minimis Offer**

# **ATTACHMENT**

**A**

**Attachment A**

**De Minimis Parties Eligible for Settlement**

**American Electronics Laboratory**

c/o BAE Systems  
Patrick S. Till, Environmental/Safety Engineer  
305 Richardson Road  
Lansdale, PA 19446

**Boekel Industries**

c/o Boekel Scientific Industries  
Mark Davies  
855 Pennsylvania Ave  
Feasterville, PA 19053

**Ervins Crafts**

c/o Irvin's Craft Shop  
Irvin Hoover  
RR#1, Box 73  
Mount Pleasant Mills, PA 17853

c/o Robert Hoffman, Esq.  
Reed, Smith  
P.O. Box 11844  
Harrisburg, PA 17108

**Elco Corporation**

Dennis Oldland, Corporate Environmental Safety and Security  
801 17<sup>th</sup> Avenue South  
P.O. Box 861  
Myrtle Beach, SC 29577

c/o Phillip L. Hinerman, Esq.  
Fox, Rothchild, O'Brien & Frankel, LLP  
2000 Market Street, 10<sup>th</sup> Floor  
Philadelphia, PA 19103-3291

**K-D Tool Manufacturing**

c/o Danaher Tool Group  
Robert Daveny, President  
805 Estelle Drive  
Lancaster, PA 17601

c/o Phillip L. Hinerman, Esq.  
Fox, Rothchild, O'Brien & Frankel, LLP  
2000 Market Street, 10<sup>th</sup> Floor  
Philadelphia, PA 19103-3291

**Maida Development Company**

20 Libbey Street  
Hampton, VA 23663

c/o Chip Gauch, Esq.  
Hunton & Williams  
Riverfront Plaza, East Tower  
951 East Byrd Street  
Richmond, VA 23219-4074

**McHugh Railroad Maintenance Equipment Company**

James McHugh, CEO  
Box 6  
Fairless Hills, PA 19030

c/o Gerald Hughes, Esq.  
850 Bare Tavern Road  
West Trenton, NJ 08628

**Photofabrication Chemical and Equipment Company**

522 Lancaster Avenue  
Malvern, PA 19355

c/o Phillip L. Hinerman, Esq.  
Fox, Rothchild, O'Brien & Frankel, LLP  
2000 Market Street, 10<sup>th</sup> Floor  
Philadelphia, PA 19103-3291

**R & E Martin, Inc.**

Richard Martin II, CEO  
P.O. Box 4701  
Philadelphia, PA 19134

c/o Phillip L. Hinerman, Esq.  
Fox, Rothchild, O'Brien & Frankel, LLP  
200 Market Street  
Philadelphia, PA 19103-3291

**Technitrol, Inc.**

Larry Gaudino, Director of Environmental Services  
1003 Corporate Lane  
Export, PA 15632

**Malvern TCE Site De Minimis Offer**

# **ATTACHMENT**

## **B**

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**IN THE MATTER OF:**

**Malvern TCE Superfund Site  
258 N. Phoenixville Pike  
Malvern, Pennsylvania**

**Proceeding under Section 122(g)(4)  
of the Comprehensive Environmental  
Response, Compensation, and  
Liability Act of 1980, as amended,  
42 U.S.C. § 9622(g)(4)**

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**U.S. EPA Docket No.**

**ADMINISTRATIVE ORDER  
ON CONSENT FOR DE MINIMIS  
SETTLEMENT**

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**IN THE MATTER OF:**

**Malvern TCE Superfund Site  
258 N. Phoenixville Pike  
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**Proceeding under Section 122(g)(4)  
of the Comprehensive Environmental  
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**U.S. EPA Docket No.**

**ADMINISTRATIVE ORDER  
ON CONSENT FOR DE MINIMIS  
SETTLEMENT**

**I. JURISDICTION**

- A. This Administrative Order on Consent ("Consent Order" or "Order") is issued pursuant to the authority vested in the President of the United States by Section 122(g)(4) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9622(g)(4), to reach settlements in actions under Section 106 or 107 of CERCLA, 42 U.S.C. § 9606 or 9607. The authority vested in the President has been delegated to the Administrator of the United States Environmental Protection Agency ("EPA") by Executive Order 12580, 52 Fed. Reg. 2923 (Jan. 29, 1987), and further delegated to the Regional Administrators of the EPA by EPA Delegation No. 14-14-E (September 13, 1987).
- B. This Consent Order represents the second Administrative Order On Consent for De Minimis Settlement entered into by and between EPA and de minimis potentially responsible parties ("PRPs") for the Malvern TCE Superfund Site. The first Administrative Order on Consent for De Minimis Settlement ("De Minimis AOC I"), Docket No. III-98-074-DC, by and between EPA and certain De Minimis PRPs ("De Minimis Respondents I") became effective on or about September 28, 1999.
- C. This Consent Order is entered into voluntarily by and between EPA and each of the de minimis potentially responsible parties listed in Appendix "A" who have executed the attached signature pages ("De Minimis Respondents II" or "Respondents II"). Each De Minimis Respondent II agrees to undertake all actions required by the terms and conditions of this Order. Each De Minimis Respondent II consents to and will not contest EPA's jurisdiction to issue this Order or to implement or enforce its terms.

- D. The De Minimis Respondents II agree and submit that the United States District Court for the Eastern District of Pennsylvania has jurisdiction over this Consent Order for the purposes of any subsequent proceedings for implementation or enforcement of this Order because a release or threatened release of hazardous substances has occurred at the Malvern TCE Superfund Site ("Site") in Malvern, Chester County, Pennsylvania, as hereinafter defined, which is located in such judicial district.
- E. This Consent Order was agreed to and executed by EPA and the De Minimis Respondents II in good faith to avoid the expense and delay of litigation over the matters addressed by this Consent Order.
- F. EPA and the De Minimis Respondents II agree that this Consent Order is entered into without any admission of liability for any purpose as to any matter arising out of the transactions or occurrences alleged in the Order. The participation of the De Minimis Respondents II in this Order shall not be considered an admission of liability and shall not be admissible in evidence against the De Minimis Respondents II in any judicial or administrative proceeding other than proceedings to implement or enforce this Order or a judgement relating to it.

## **II. STATEMENT OF PURPOSE**

- 1. By entering into this Consent Order, the mutual objectives of the Parties are:
  - a. to reach a final settlement among the Parties with respect to the Site pursuant to Section 122(g) of CERCLA, 42 U.S.C. § 9622(g), that allows the De Minimis Respondents II to make a cash payment, including a premium, to resolve their alleged civil liability under Sections 106 and 107 of CERCLA, 42 U.S.C. §§ 9606 and 9607, for injunctive relief with regard to the Site and for response costs incurred and to be incurred at or in connection with the Site, thereby reducing litigation relating to the Site, subject to a reopener specified in Paragraph 28 below;
  - b. to simplify the remaining enforcement activities concerning the Site by reducing to the extent possible the number of parties involved in the Site;
  - c. to reimburse the Hazardous Substances Superfund for a portion of the response costs incurred or to be incurred in connection with the Site without waiving the United States' assertion of joint and several liability against parties other than the De Minimis Respondents II.

### III. PARTIES BOUND

2. This Consent Order shall apply to and be binding upon EPA, and upon the De Minimis Respondents II, and their successors and assigns. Each signatory to this Consent Order represents that he or she is fully authorized to enter into the terms and conditions of this Consent Order and to execute and bind legally the Party represented by him or her. Any change in ownership or corporate status of any De Minimis Respondent II, including, but not limited to, any transfer of assets or real or personal property, shall in no way alter such De Minimis Respondent II's responsibilities under this Consent Order.

### IV. DEFINITIONS

3. Unless otherwise expressly provided herein, terms used in this Consent Order that are defined in CERCLA or in regulations promulgated under CERCLA shall have the meaning assigned to them in the statute or regulations. Whenever the terms listed below are used in this Consent Order, the following definitions shall apply:
  - a. "AOC I" or "De Minimis AOC I" shall mean the Administrative Order on Consent, Docket No. III-98-074-DC, by and between EPA and certain De Minimis PRPs ("De Minimis Respondents I") that became effective on or about September 28, 1999, in connection with the Site.
  - b. "CERCLA" shall mean the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. § 9601, et seq.
  - c. "Consent Order" or "Order" shall mean this Administrative Order on Consent and all appendices attached hereto. In the event of conflict between this Order and any appendix, the Order shall control.
  - d. "Day" shall mean a calendar day unless expressly stated to be a working day. "Working day" shall mean a day other than a Saturday, Sunday, or Federal holiday. In computing any period of time under this Consent Order, where the last day would fall on a Saturday, Sunday, or Federal holiday, the period shall run until the close of business of the next working day.
  - e. "De Minimis PRPs" shall mean all potentially responsible parties identified by EPA for the Site eligible to participate in a de minimis settlement, as listed in the Volumetric Ranking Summaries attached as Exhibit "C," and/or the New Volumetric Ranking Summary for the Second De Minimis Settlement attached as Exhibit "D."

- f. "EPA" shall mean the United States Environmental Protection Agency and any successor departments, agencies or instrumentalities.
- g. "EPA Hazardous Substance Superfund" shall mean the Hazardous Substance Superfund established by the Internal Revenue Code, 26 U.S.C. § 9507.
- h. "Future Response Costs" shall mean all Response Costs, including but not limited to direct and indirect costs, and recoverable costs of oversight of removal or remedial actions, that may be incurred by EPA in connection with the Site, after October 3, 2000, plus Interest on all such costs.
- i. "Hazardous Substance" shall have the meaning provided in Section 101(14) of CERCLA, 42 U.S.C. § 9601(14).
- j. "Interest" shall mean interest at the current rate specified for interest on investments of the EPA Hazardous Substance Superfund established by 26 U.S.C. § 9507, compounded annually on October 1 of each year, in accordance with 42 U.S.C. § 9607(a).
- k. "National Contingency Plan" or "NCP" shall mean the National Oil and Hazardous Substances Pollution Contingency Plan promulgated pursuant to Section 105 of CERCLA, 42 U.S.C. § 9605, as set forth at 55 Fed. Reg. 8,666 (March 8, 1990), and codified at 40 C.F.R. Part 300, including any amendments thereto.
- l. "Natural Resources" shall have the meaning provided in Section 101(16) of CERCLA, 42 U.S.C. § 9601(16).
- m. "New Volumetric Ranking Summary for the Second De Minimis Settlement" or "New VRS" shall mean the list prepared by EPA and attached hereto as Exhibit "D," which sets forth each De Minimis Respondent II's total payment amount. The New VRS differs from the Volumetric Ranking Summaries dated 11/30/98 and attached hereto as Appendix "C" only in the cost numbers used by EPA to calculate each De Minimis Respondent II's payment amount. The New VRS and the 11/30/98 Volumetric Ranking Summaries do not differ in terms of methodology or volumetric information.
- n. "Paragraph" shall mean a portion of this Consent Order identified by an arabic numeral or an upper case letter.

- o. "Parties" shall mean EPA and the De Minimis Respondents II.
- p. "Past Response Costs" shall mean all Response Costs, including but not limited to, direct and indirect costs that EPA has paid at or in connection with the Site through October 3, 2000, plus Interest on all such costs which has accrued pursuant to 42 U.S.C. § 9607(a) through such date.
- q. "Remedial Costs" shall mean all response costs incurred in implementing the remedial action called for in the Record of Decision ("ROD") dated November 26, 1997, and/or any Explanation for Significant Differences ("ESD") and/or any amendment to that ROD, and/or any new ROD issued in place of that ROD.
- r. "Respondents II" or "De Minimis Respondents II" shall mean those persons, corporations, or other entities listed in Appendix "A," and successors and assigns of such persons, corporations, or other entities, that are signatories to this Consent Order.
- s. "Response Costs" shall mean all costs of "response" as that term is defined by Section 101(25) of CERCLA, 42 U.S.C. § 9601(25) incurred with respect to the Malvern TCE Site.
- t. "Section" shall mean a portion of this Consent Order identified by a roman numeral.
- u. "Site" shall mean the Malvern TCE Superfund Site, including areas defined in 40 C.F.R. § 300.400(e), located at and around 258 N. Phoenixville Pike in Malvern, Chester County, Pennsylvania and depicted more clearly on the map attached as Appendix "B."
- v. "United States" shall mean the United States of America, including its departments, agencies and instrumentalities.
- w. "Volumetric Ranking Summaries" shall mean those lists prepared by EPA in connection with the first de minimis settlement offered by EPA for the Site and resulting in AOC I. The Volumetric Ranking Summaries set forth each De Minimis PRP's volumetric shares and settlement amounts to be paid in order to participate in the De Minimis AOC I. These summaries are attached as Appendix "C."

## **V. EPA'S STATEMENT OF FACTS**

4. The Site is located at and around 258 N. Phoenixville Pike, Malvern, East Whiteland Township, Chester County, Pennsylvania. A Transcontinental Gas Pipeline Co. natural gas pipeline right-of-way extends along the southern boundary of the Site, with residential areas and areas with natural forestation and vegetation bordering the property to the west, north and east. The approximate area of the Site is identified on the map attached as Appendix "B."
5. The Site includes, but is not limited to, a parcel of approximately 5-acres at which Chemclene Corporation ("Chemclene"), from 1952 until 1992, among other things, sold and reclaimed industrial cleaning solvents including trichloroethene ("TCE"), 1,1,1,-trichloroethane, perchloroethylene, and methylene chloride. These solvents were used by local industries for degreasing metal parts and other cleaning purposes. Chemclene used a distillation process to remove impurities from the chlorinated solvents. The distilled solvents were then returned to customers for reuse. The end products of processing waste solvents are the reclaimed solvents and chlorinated still bottoms. The chlorinated waste solvents are listed hazardous wastes pursuant to the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6901 *et seq.*, and, therefore, the resulting still bottoms are listed hazardous waste. Wastes shipped to Chemclene were stored, processed, disposed, and bulk accumulated at the Site for eventual transfer to other locations, and a small amount was directly transshipped to other locations.
6. Chemclene utilized two areas of the Site, the Main Plant Area ("MPA") and the Former Disposal Area ("FDA"), as part of its business operations. Chemclene utilized the MPA to receive, accumulate, store, and process wastes, including hazardous substances. Wastes, including hazardous substances, also were released and disposed of at the MPA as a result of Chemclene's operations. Chemclene disposed of wastes, including hazardous substances, at the FDA.
7. In the spring of 1980, TCE was detected in groundwater from several wells in the vicinity of the Chemclene facility. Private domestic wells and on-Site monitoring wells were sampled by Pennsylvania's Department of Environmental Resources and Chemclene in June 1980 and July 1981. Analytical results of this sampling revealed contamination of the underlying aquifer with chlorinated ethenes and related compounds.

8. Pursuant to Section 105 of CERCLA, 42 U.S.C. § 9605, EPA proposed the Site for listing on the National Priorities List ("NPL"), set forth at 40 C.F.R. Part 300. Appendix "B," by publication in the Federal Register. Final listing on the NPL as the Malvern TCE Superfund Site was in September 1983.
9. Hazardous substances have been or are threatened to be released at or from the Site, including, but not limited to, at or from the MPA and FDA at the Site.
10. Between 1981 and 1986, Chemclene commenced certain activities, including installation of filters on contaminated home wells located within a residential development south of the Chemclene property, FDA debris and drum removal and limited soil excavation, and removal of underground storage tanks and soil sampling at the MPA, to address EPA concerns of contamination at the Site. In 1987, Chemclene entered into a Corrective Action Order pursuant to RCRA (Docket No. RCRA-III-010-CA) with EPA. Chemclene did not complete a RCRA Facilities Investigation of the Site or implement corrective measures at the Site, as required by the RCRA Order.
11. As a result of the release or threatened release of hazardous substances, EPA has undertaken response actions at or in connection with the Site under Section 104 of CERCLA, 42 U.S.C. § 9604, and will undertake response actions in the future. Among other things, EPA:
  - a. assumed control of maintenance activities of filter units that had been installed on contaminated residential wells located south of the Site and of periodic sampling of residential wells;
  - b. upgraded residential well filter systems in response to analytical results from well samples that showed contamination was passing through the existing filters into the homes;
  - c. conducted and completed in January 1997 a Remedial Investigation of the Site;
  - d. completed a Feasibility Study of the Site in June 1997; and
  - e. issued a Record of Decision in November 1997 pursuant to which EPA selected a remedy to be implemented at the Site.
12. In performing these response actions, EPA has incurred and will continue to incur response costs. As of October 3, 2000, EPA had incurred \$4,776,948.97 in Past Response Costs. EPA may incur Future Response Costs at the Site.

13. EPA has reviewed records describing the transactions of PRPs, including the De Minimis PRPs, in relation to the Site. These records include information describing the amount and nature of waste contributed to the Site. Based upon that review, EPA has determined that each De Minimis PRP, including each De Minimis Respondent II listed in Appendix "A," arranged for disposal or treatment, or arranged with a transporter for disposal or treatment, of a hazardous substance owned or possessed by such De Minimis Respondent II, at the Site, or accepted a hazardous substance for transport to the Site.
14. Information currently known to EPA indicates that each De Minimis PRP, including each De Minimis Respondent II listed in Appendix "A," contributed between 1.6 drums and 0.75% of the total waste sent to the Site, and that the toxic or other hazardous effects of the hazardous substances contributed by each De Minimis PRP, including each De Minimis Respondent II, to the Site are not significantly more toxic than the other hazardous substances at the Site. The Volumetric Ranking Summaries ("VRS") (Appendix "C") and New Volumetric Ranking Summary for the Second De Minimis Settlement ("New VRS") (Appendix "D") prepared for the Site list, among other things, the estimated volume of waste contributed to the Site by each De Minimis PRP, including each De Minimis Respondent II, and the percentage of waste contributed to the Site by each Respondent in relation to the total estimated volume of waste sent to the Site during the 1968 to 1992 time period. The volumes and percentage shares presented in the VRS and New VRS represent EPA's best estimates and are based on all information currently in EPA's possession.
15. EPA has estimated that the total response costs incurred and to be incurred at or in connection with the Site by the EPA Hazardous Substance Superfund and by private parties is \$20,506,099.97. This amount includes \$4,776,948.97 in response costs incurred by EPA through October 3, 2000, and Future Response Costs in the amount of \$15,729,151.00 (estimated future Site remedial costs in the amount of \$15,529,151.00, and EPA future remedial oversight costs estimated to be \$200,000.00). EPA has received certain information that indicates these estimated remedial costs could be revised.
16. The total payment required to be made by each De Minimis Respondent II pursuant to this Consent Order is set forth in the New Volumetric Ranking Summary for the Second De Minimis Settlement, attached as Appendix "D." The total payment to be made by each De Minimis Respondent II represents a minor portion of this total response costs incurred and to be incurred at or in connection with the Site, as referenced in Paragraph 15 of this Consent Order.



17. EPA has identified PRPs other than De Minimis Respondents II, who owned or operated the Site, or who arranged for disposal or treatment, or arranged with a transporter for disposal or treatment, at the Site, of a hazardous substance owned or possessed by such persons.

## **VI. DETERMINATIONS**

18. Based upon the Statement of Facts set forth above and on the administrative record for this Site, EPA has determined that:
- a. the Site is a "facility" as that term is defined in Section 101(9) of CERCLA, 42 U.S.C. § 9601(9).
  - b. each De Minimis Respondent II is a "person" as that term is defined in Section 101(21) of CERCLA, 42 U.S.C. § 9601(21).
  - c. each De Minimis Respondent II is liable within the meaning of Sections 107(a) and 122(g)(1) of CERCLA, 42 U.S.C. §§ 9607(a) and 9622(g)(1).
  - d. the materials shipped to the Site by the De Minimis Respondents II include "hazardous substances" within the meaning of Section 101(14) of CERCLA, 42 U.S.C. § 9601(14).
  - e. the past, present or future migration of hazardous substances from the Site constitutes an actual or threatened "release" as that term is defined in Section 101(22) of CERCLA, 42 U.S.C. § 9601(22).
  - f. the Past Response Costs incurred and Future Response Costs to be incurred in connection with the Site are removal and remedial response costs within the meaning of Section 107(a) of CERCLA, 42 U.S.C. § 9607(a).
  - g. prompt settlement with each De Minimis Respondent II is practicable and in the public interest within the meaning of Section 122(g)(1) of CERCLA, 42 U.S.C. § 9622(g)(1).
  - h. as to each De Minimis Respondent II, this Consent Order involves only a minor portion of the response costs at the Site within the meaning of Section 122(g)(1) of CERCLA, 42 U.S.C. § 9622(g)(1).
  - i. each De Minimis Respondent II is eligible for a de minimis settlement pursuant to Section 122(g)(1)(A) of CERCLA, 42 U.S.C. § 9622(g)(1)(A).

since both the amount and the toxicity or other hazardous effects of the hazardous substances contributed to the Site by each De Minimis Respondent II is minimal in comparison to other hazardous substances at the Site.

## **VII. ORDER**

19. Based on the foregoing Statement of Facts and Determinations by EPA, in order to reach an expedited de minimis settlement in connection with the Site, in consideration of, and in exchange for, the promises, mutual undertakings, and covenants set forth herein, and intending to be legally bound hereby, EPA and the De Minimis Respondents II agree, and EPA hereby Orders, that the De Minimis Respondents II shall pay their cost share as set forth below:
  - a. Within thirty (30) days of the effective date of this Order, each De Minimis Respondent II shall pay its volumetric share of the cost basis of \$20,506,099.97 (\$4,776,948.97 in Past Response Costs; and \$15,729,151.00 in Future Response Costs, which include EPA future remedial oversight costs in the amount of \$200,000.00). The amount to be paid by each settling De Minimis Respondent II is set forth under the Total Payment Column included in the New Volumetric Ranking Summary for the Second De Minimis Settlement, attached as Appendix "D."
  - b. The de minimis settlement payment required of each De Minimis Respondent II, as referred to in Paragraph 19.a. of this Order, also includes a settlement premium. This premium is designed to cover risks and uncertainties associated with this settlement, including but not limited to, the risk that total response costs incurred or to be incurred at or in connection with the Site by the EPA Hazardous Substance Superfund, or by any private party incurring Remedial Costs, will exceed the estimated total response costs, upon which Respondent's payments are based. However, the premium is not designed to cover the risk that Remedial Costs will exceed \$25 million, and consequently, the Covenant Not to Sue is subject to the Reservation of Rights in Paragraph 28.
  - c. De Minimis Respondents II, Maida Development Corporation and McHugh Railroad Maintenance Equipment Company, as identified in Appendix "D," were previously offered by EPA an opportunity to participate in AOC I, but did not participate in that settlement.

- d. De Minimis Respondents II, American Electronics Laboratories, Boekel Scientific Industries, Inc., Elco Corporation, Ervins Crafts, Photofabrication Chemical and Equipment Company, and R & E Martin, previously were offered by EPA an opportunity to participate in AOC I; however, EPA's records do not reflect that this occurred.

### **VIII. PAYMENT**

20. Payments by De Minimis Respondents II shall be made as follows:

- a. Within thirty (30) days of the effective date of this Consent Order, each De Minimis Respondent II shall pay the amount listed for the De Minimis Respondent II in the New Volumetric Ranking Summary for the Second De Minimis Settlement, attached as Appendix "D" to this Consent Order and as specified in Section VII (Order), above.
- b. Any De Minimis Respondent II may make payment in two equal installments, the first due and payable within thirty (30) days of the effective date of this Consent Order, and the second due and payable within one year of the effective date of the Consent Order.
- c. Each payment shall be made by certified or cashier's check made payable to "EPA Hazardous Substance Superfund." Each check shall reference the name and address of the party making payment, the Site name, the EPA Region and Site Spill ID Number 03-91, and the EPA Docket Number for this action, and shall be sent to:

EPA Superfund  
U.S. EPA/Region III  
Attention: Superfund Accounting  
P.O. Box 360515  
Pittsburgh, PA 15251-6515

- d. At the time of payment, each De Minimis Respondent II shall send notice that such payment has been made to:

Charlie Root (3HS21)  
Remedial Project Manager  
United States Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

21. EPA shall deposit any de minimis settlement proceeds received into a Malvern TCE Superfund Site special account within the EPA Hazardous Substance Superfund. The proceeds can be retained and used by EPA, or by a party designated by EPA, to conduct or finance response action at or in connection with the Site and/or, at EPA's discretion, can be transferred to the EPA Hazardous Substance Superfund as reimbursement for response costs incurred at or in connection with the Site by the EPA Hazardous Substance Superfund. Any amounts remaining in a Malvern TCE Superfund Site special account shall be transferred by EPA to the EPA Hazardous Substance Superfund.
22. Any amounts due and owing by a De Minimis Respondent II pursuant to the terms of this Consent Order but not paid in accordance with the terms of this Consent Order shall accrue interest, as defined in Paragraph 3.j. of this Consent Order, which shall be assessed to such De Minimis Respondent II.

#### **IX. FAILURE TO MAKE PAYMENT**

23. If any De Minimis Respondent II fails to make any payment under the terms of this Consent Order within thirty (30) days of the payment becoming due, this Consent Order shall be terminated and the Covenant Not to Sue set forth in Section XI, Paragraph 27, shall become null and void as to that De Minimis Respondent II.
24. Nothing in this Consent Order shall be construed as prohibiting, altering, or in any way limiting the ability of the United States to seek any other remedies or sanctions available by virtue of a Respondent's violation of this Order or of the statutes and regulations upon which it is based, including, but not limited to, penalties pursuant to Section 122(l) of CERCLA, 42 U.S.C. § 9622(l).

#### **X. CERTIFICATION OF RESPONDENTS**

25. By signing this Consent Order, each De Minimis Respondent II certifies, individually, that, to the best of its knowledge and belief, it has:
  - a. conducted a thorough, comprehensive, good faith search for documents, and that to the best of its knowledge and belief, such De Minimis Respondent II has no information which would result in a material change of the information set forth in the VRS and New VRS. For purposes of this provision, a material change of the information set forth in the VRS and New VRS would occur if any PRP's Main Plant Area Percentage or Former Disposal Area Percentage listed in the VRS and New VRS

changes by more than ten percent (10%). A material change of the information set forth in the VRS and New VRS also would include any information that results in an increase in the MPA% for any PRP identified in the VRS and New VRS to greater than 0.75%;

- b. not altered, mutilated, discarded, destroyed or otherwise disposed of any records, documents, or other information relating to its potential liability regarding the Site after notification of potential liability or the filing of a suit against it regarding the Site; and
  - c. fully complied with any and all EPA requests for information regarding the Site pursuant to Sections 104(e) and 122(e) of CERCLA, 42 U.S.C. §§ 9604(e) and 9622(e) and Section 3007 of RCRA, 42 U.S.C. § 6927.
26. If this certification is subsequently determined to be false, such De Minimis Respondent II shall forfeit all payments made pursuant to Section VIII of this Consent Order. Such forfeiture shall not constitute liquidated damages and shall not in any way foreclose the United States' right to pursue any other causes of action arising from such De Minimis Respondent II's false certification. Providing false, fictitious, or fraudulent statements or representations to the United States is punishable as a crime under 18 U.S.C. § 1001.

#### **XI. COVENANT NOT TO SUE BY UNITED STATES**

27. In consideration of the payments that will be made by the De Minimis Respondents II under the terms of this Consent Order, and except as specifically provided in Section XII (Reservations of Rights by United States), the United States covenants not to sue or take administrative action against any of the De Minimis Respondents II for civil liability for reimbursement of Response Costs or for injunctive relief pursuant to Sections 106 or 107 of CERCLA, 42 U.S.C. §§ 9606 or 9607, or for injunctive relief pursuant to Section 7003 of the RCRA, 42 U.S.C. § 6973, with regard to the Site. With respect to present and future liability, this covenant not to sue shall take effect for each De Minimis Respondent II upon receipt of that De Minimis Respondent II's payment as required by Section VIII. With respect to each De Minimis Respondent II, individually, these covenants are conditioned upon complete performance by such De Minimis Respondent II of all obligations under this Consent Order, and the veracity and completeness of the information provided to EPA by such De Minimis Respondent II relating to each De Minimis Respondent II's involvement with the Site. These covenants shall be null and void with respect to any individual De Minimis Respondent II that fails to perform all obligations under this Consent Order in a timely and complete manner, or has provided materially false, incomplete, or incorrect information in

such De Minimis Respondent II's Certification under Section X of this Consent Order. These covenants extend only to De Minimis Respondents II and do not extend to any other person.

## **XII. RESERVATIONS OF RIGHTS BY UNITED STATES**

28. The United States expressly reserves, and nothing in this Consent Order is intended to be nor shall it be construed as a release or covenant not to sue for, any claim or cause of action, administrative or judicial, civil or criminal, past or future, at law or in equity, which the United States, including EPA, may have against any of the De Minimis Respondents II for:
  - a. any liability as a result of failure to make the payments required by Section VIII (Payment by De Minimis Respondents II), or otherwise comply with the terms of this Consent Order;
  - b. liability arising from the past, present, or future disposal, release or threat of release of hazardous substances at any facility, as defined in Section 101(9) of CERCLA, 42 U.S.C. § 9601(9), other than the Site;
  - c. any matters not expressly included in Section XI above (Covenant Not to Sue by the United States);
  - d. liability for damages for injury to, destruction of or loss of natural resources, and for the costs of any natural resource damage assessments;
  - e. liability for response costs relating to the Site that have been or may be incurred by Natural Resource trustees, including, but not limited to, the Department of Interior, of the United States;
  - f. criminal liability;
  - g. liability of any De Minimis Respondent II for violations of federal or state law; or
  - h. any liability for Remedial Costs in excess of \$25 million.
29. Nothing in this Consent Order constitutes a covenant not to sue or to take action or otherwise limits the ability of the United States to seek or obtain further relief from any De Minimis Respondent II, and the covenant not to sue set forth above and the contribution protection provided below will become null and void as to any individual De Minimis Respondent II, if:

- a. such De Minimis Respondent II contributed more than 0.75% of the total volume of the hazardous substances at the Site or contributed to the Site hazardous substances which contributed disproportionately to the cumulative toxic or other hazardous effects of the hazardous substances at the Site;
- b. such De Minimis Respondent II fails to make any payment under the terms of this Consent Order; and/or,
- c. such De Minimis Respondent II's certification in Section X of this Order is false or materially inaccurate.

### **XIII. COVENANT NOT TO SUE BY RESPONDENTS**

- 30. De Minimis Respondents II covenant not to sue and agree not to assert any claims or causes of action against the United States or its contractors or employees with respect to the Site or this Consent Order including, but not limited to:
  - a. Any direct or indirect claim for reimbursement from the EPA Hazardous Substance Superfund based on Sections 106(b)(2), 107, 111, 112, or 113 of CERCLA, 42 U.S.C. §§ 9606(b)(2), 9607, 9611, 9612, or 9613, or any other provision of law;
  - b. any claims arising out of response activities at the Site; and
  - c. any claim against the United States pursuant to Sections 107 and 113 of CERCLA, 42 U.S.C. §§ 9607 and 9613, relating to the Site.
- 31. Nothing in this Consent Order shall be deemed to constitute preauthorization or approval of a claim within the meaning of Section 111 of CERCLA, 42 U.S.C. § 9611, or 40 C.F.R. § 300.700(d).

### **XIV. EFFECT OF SETTLEMENT/CONTRIBUTION PROTECTION**

- 32. Nothing in this Consent Order shall be construed to create any rights in, or grant any cause of action to, any person not a party to this Consent Order. The preceding sentence shall not be construed to waive or nullify any rights that any person not a signatory to this Consent Order may have under applicable law. The United States and the De Minimis Respondents II each reserve any and all rights (including, but not limited to, any right to contribution), defenses, claims,

demands, and causes of action which each party may have with respect to any matter, transaction, or occurrence relating in any way to the Site against any person not a party hereto.

33. EPA and the De Minimis Respondents II agree that the actions undertaken by De Minimis Respondents II in accordance with this Consent Order do not constitute an admission of any liability by any De Minimis Respondent II. The De Minimis Respondents II do not admit, and retain the right to controvert in any subsequent proceedings, other than proceedings brought by the United States to implement or enforce this Consent Order, the validity of the Statement of Facts or Determinations contained in this Consent Order.
34. The De Minimis Respondents II agree that with respect to any suit or claim for contribution brought by them for matters related to this Consent Order they will provide notification to EPA in writing no later than sixty (60) days prior to the initiation of such suit or claim. The De Minimis Respondents II also agree that with respect to any suit or claim for contribution brought against them for matters related to this Consent Order they will provide notification to EPA in writing within ten (10) days of service of the complaint on them. In addition, De Minimis Respondents II shall notify EPA within ten (10) days of receipt of any order from a court setting any such case for trial.
35. In any subsequent administrative or judicial proceeding initiated by the United States for injunctive relief, recovery of response costs, or other appropriate relief relating to the Site, De Minimis Respondents II shall not assert, and may not maintain, any defense or claim based upon the principles of waiver, res judicata, collateral estoppel, issue preclusion, claim-splitting, or other defenses based upon any contention that the claims raised by the United States in the subsequent proceeding were or should have been brought in the instant case; provided, however, that nothing in this Paragraph affects the enforceability of the covenants not to sue set forth in Section XI (Covenants Not to Sue by the United States).
36. Subject to the Reservation of Rights in Section XII of this Order, each De Minimis Respondent II, by entering into and complying with the terms of this Consent Order, is entitled to protection from contribution actions or claims as provided by Sections 113(f)(2) and 122(g)(5) of CERCLA, 42 U.S.C. §§ 9613(f)(2) and 9622(g)(5), for "matters addressed" in this Consent Order. The "matters addressed" in this Consent Order are all response actions taken by the United States and by private parties, and all response costs incurred and to be incurred by the United States, including Past Response Costs and Future Response Costs, as such terms are defined in Paragraphs 3(p) and 3(h) of this Consent Order, and by private parties, at or in connection with the Site. The "matters addressed" in this settlement do not include those response costs or response



actions as to which the United States has reserved its rights under this Consent Order (except for claims for failure to comply with this Consent Order), in the event that the United States asserts rights against De Minimis Respondents II coming within the scope of such reservations.

#### **XV. OPPORTUNITY FOR PUBLIC COMMENT**

37. This Consent Order shall be subject to a thirty-day public comment period pursuant to Section 122(i) of CERCLA, 42 U.S.C. § 9622(i), and Section 7003(d) of RCRA, 42 U.S.C. § 6973(d). EPA shall provide notice, and an opportunity for a public meeting in the affected area on the proposed settlement in accordance with Section 7003(d) of RCRA, 42 U.S.C. § 6973 (d). In accordance with Section 122(i)(3) of CERCLA, 42 U.S.C. § 9622(i)(3), EPA may withdraw or withhold its consent to this Consent Order if comments received disclose facts or considerations which indicate that this Consent Order is inappropriate, improper or inadequate.

#### **XVI. ATTORNEY GENERAL APPROVAL**

38. In accordance with Section 122(g)(4) of CERCLA, this Consent Order shall not become effective without the prior written approval of the Attorney General or his designee.

#### **XVII. COSTS AND FEES**

39. De Minimis Respondents II shall bear their own costs and attorney's fees regarding this matter. Nothing in this Consent Order shall be construed to create any rights in, or grant any cause of action to, any person not a Party to this Consent Order. The United States and De Minimis Respondents II each reserve any and all rights (including, but not limited to, any right to contribution), defenses, claims, demands, and causes of action which each Party may have with respect to any matter, transaction, or occurrence relating in any way to the Site against any person not a Party hereto.

#### **XVIII. INTEGRATION/APPENDICES**

40. This Consent Order and its appendices constitute the final, complete and exclusive agreement and understanding among the Parties with respect to the settlement embodied in this Consent Order. The Parties acknowledge that there are no representations, agreements or understandings relating to the settlement other than those expressly contained in this Consent Order. The following appendices are attached to and incorporated into this Consent Order:

"Appendix A" -- List of De Minimis Respondents II

"Appendix B" -- Map of the Site

"Appendix C" -- Volumetric Ranking Summaries (Showing Volumes and Payment Amounts)

"Appendix D" -- New Volumetric Ranking Summary for the Second De Minimis Settlement

**XIX. EFFECTIVE DATE**

41. The effective date of this Consent Order shall be the date upon which EPA issues written notice to De Minimis Respondents II that the public comment period pursuant to Paragraph 37 has closed and that comments received, if any, do not require modification of or EPA withdrawal from this Consent Order.

IT IS SO AGREED AND ORDERED:

U.S. Environmental Protection Agency:

By: \_\_\_\_\_  
Thomas C. Voltaggio  
Acting Regional Administrator, Region III

\_\_\_\_\_  
Date

THE UNDERSIGNED RESPONDENT enters into this Consent Order in the matter of [insert U.S. EPA docket number], relating to the Malvern TCE Superfund Site, 258 N. Phoenixville Pike, Malvern, Pennsylvania.

FOR RESPONDENT: \_\_\_\_\_  
[Name]

\_\_\_\_\_  
[Address]

By: \_\_\_\_\_  
[Signature] [Date]

\_\_\_\_\_  
[Type name and Title]

De Minimis Respondent opts to pay in two equal installments, as provided for in Paragraph 19 of this Consent Order:

☐ Yes

☐ No

**MALVERN TCE SITE DeMINIMIS**

**CONSENT ORDER**

# **APPENDIX A**

## **Appendix A**

### **De Minimis Parties Eligible for Settlement**

#### **American Electronics Laboratory**

c/o BAE Systems  
Patrick S. Till, Environmental/Safety Engineer  
305 Richardson Road  
Lansdale, PA 19446

#### **Boekel Industries**

c/o Boekel Scientific Industries  
Mark Davies  
855 Pennsylvania Ave  
Feasterville, PA 19053

#### **Ervins Crafts**

c/o Irvin's Craft Shop  
Irvin Hoover  
RR#1, Box 73  
Mount Pleasant Mills, PA 17853

c/o Robert Hoffman, Esq.  
Reed, Smith  
P.O. Box 11844  
Harrisburg, PA 17108

#### **Elco Corporation**

Dennis Oldland, Corporate Environmental Safety and Security  
801 17<sup>th</sup> Avenue South  
P.O. Box 861  
Myrtle Beach, SC 29577

c/o Phillip L. Hinerman, Esq.  
Fox, Rothchild, O'Brien & Frankel, LLP  
2000 Market Street, 10<sup>th</sup> Floor  
Philadelphia, PA 19103-3291

#### **K-D Tool Manufacturing**

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**MALVERN TCE SITE DeMINIMIS**

**CONSENT ORDER**

# **APPENDIX B**

## HALVERN TCE SITE MAP

**MALVERN TCE SITE DeMINIMIS**

**CONSENT ORDER**

# **APPENDIX C**



**Malvern TCE Superfund Site**  
**Explanation Sheet for the Final Volumetric Ranking Summary (VRS)**

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) Final Volumetric Ranking Summary (VRS). Please refer to the example provided below for an illustration of the process used to calculate individual total payment.<sup>1</sup>

<u>PRP Name</u>	<u>FDA Drums</u>	<u>FDA %</u>	<u>FDA Revised %</u>	<u>FDA Cost</u>	<u>FDA Premium</u>	<u>MPA Drums</u>	<u>MPA %</u>	<u>MPA Revised %</u>	<u>MPA Cost</u>	<u>MPA Premium</u>	<u>Total Payment</u>
ABC Corporation	34	1.49 %	1.52 %	\$141,249	\$62,182	82	0.29 %	0.30 %	\$26,325	\$11,483	\$241,239

PRP Name = The name of the specific potentially responsible party (PRP). Subsidiaries may be listed separately from parent companies; therefore, please review the VRS in its entirety to identify company subsidiaries that may have done business with Chemclene Corporation.

FDA Drums = The total number for drums sent to the Site before August 1, 1975.

FDA % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the total number of documented drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan<sup>1</sup> drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Cost = The FDA Revised % divided by 100 and multiplied by \$9,263,078, the total past cost<sup>2</sup> and estimated future cost associated with the FDA.

FDA Premium = The FDA Revised % divided by 100 and multiplied by the future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50%).

MPA Drums = The total number of drums received at the Site, regardless of the date, for which the PRP is responsible.

MPA % = The total number of drums sent by the PRP, regardless of date, divided by the total number of documented drums received by Chemclene Corporation, multiplied by 100.

MPA Revised % = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan drums<sup>1</sup> received by Chemclene Corporation, regardless of date, multiplied by 100.

MPA Cost = MPA Revised % divided by 100 and multiplied by \$8,680,799, the total past cost<sup>2</sup> and estimated future cost associated with the MPA.

MPA Premium = The MPA Revised % divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50%).

Total Payment = FDA Cost + FDA Premium + MPA Cost + MPA Premium.

<sup>1</sup> The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

<sup>1</sup> Non-orphan drums are drums for which there is either a viable generator or a viable broker/transporter.

<sup>2</sup> The total past cost for the Site as of June 17, 1997, is \$2,214,705.00. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA.

AR000108

**Malvern TCE Refund Site**  
**Generator Volume Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
A & J Screw Machine Products						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
A & L Handles						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
A I W Frank						9.92	0.04%	0.00%	\$0	\$0	B
A. Duie Pyle						1.00	0.00%	0.00%			D
A. Johnson & Co., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
A. S. Koch Corp.	137.00	6.00%	6.13%			250.00	0.91%	0.94%			A
Accumetrics						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Accuracy Scientific	3.00	0.13%	0.13%	\$12,430	\$5,472	34.18	0.12%	0.13%	\$11,112	\$4,847	\$33,861
Ace Service Corp.						1.00	0.00%	0.00%			D
Acro Labels						86.00	0.31%	0.32%	\$27,958	\$12,196	\$40,154
Action Manufacturing Company	49.18	2.15%	2.20%			220.31	0.80%	0.83%			A
ADEC						6.00	0.02%	0.00%	\$0	\$0	B
Adelphia Graphics Systems						40.05	0.15%	0.15%	\$13,020	\$5,680	\$18,700
Aero Plating						15.00	0.05%	0.00%	\$0	\$0	B
Agitar, Div. of Air Buensod, Inc.						9.00	0.03%	0.00%	\$0	\$0	B
Airline Hydraulic Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Airworks						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Albright Paper & Box Corp.						1.11	0.00%	0.00%			D
ALCOA	40.00	1.75%	1.79%			275.00	1.00%	1.03%			A
Alfa-Laval Separation, Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Allister Mfg.						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Amchem						70.00	0.25%	0.26%	\$22,757	\$9,927	\$32,684
American Electronics Laboratories						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Ames Supply						10.00	0.04%	0.00%	\$0	\$0	B
Ametek, Inc.	9.00	0.39%	0.40%	\$37,289	\$16,416	42.18	0.15%	0.16%	\$13,713	\$5,982	\$73,399
AMF Head Division						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Amp Corp.	34.00	1.49%	1.52%	\$140,870	\$62,015	133.00	0.48%	0.50%	\$43,238	\$18,861	\$264,984

\* Superseding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party

AR000109

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Amuneal Mfg. Co.						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Anchor Darling Co.						28.00	0.10%	0.10%	\$9,103	\$3,971	\$13,074
Angelo						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Antenna Corp.						1.00	0.00%	0.00%			D
Ark Products	5.00	0.22%	0.22%	\$20,716	\$9,120	52.00	0.19%	0.19%	\$16,905	\$7,374	\$54,115
Armstrong Cork Co.						522.70	1.89%	1.96%			A
Artco Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Asplundh Manufac. Co.						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Aston-Hill Co.						74.00	0.27%	0.00%	\$0	\$0	B
Athena Controls						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Auto-Pack						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Aydin						251.82	0.91%	0.94%			A
B. P. Oil						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941
Beckett Corporation						250.55	0.91%	0.94%			A
Beemer Engineering	4.00	0.18%	0.18%	\$16,573	\$7,296	22.00	0.08%	0.08%	\$7,152	\$3,120	\$34,141
Bendtru Company						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Berg Laboratories						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Biddle Instrument Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Bilgram Gear Company						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Bishop Tube Co.	60.00	2.63%	2.68%	\$248,594	\$109,438	130.00	0.47%	0.49%	\$42,263	\$18,436	\$418,731
Bo Peep Cleaners						12.63	0.05%	0.05%	\$4,106	\$1,791	\$5,897
Boeing Property						2.00	0.01%	0.01%	\$650	\$284	\$934
Boekel Industries						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Boyertown Packing Co.						5.27	0.02%	0.02%	\$1,713	\$747	\$2,461
Brandt Corporation						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Brittany's Ltd.						2.00	0.01%	0.00%	\$0	\$0	B
Brooks Instrument						3.00	0.01%	0.01%	\$975	\$425	\$1,401

\* Superseding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party.

AR000110

**Malvern TCE Superfund Site**  
**Generator Volume Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Brumbaugh Industries						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Budd Co.						0.36	0.00%	0.00%			D
Bunnell Plastics, Inc.						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Burroughs Corp.	147.00	6.44%	6.58%			519.54	1.88%	1.95%			A
C S S International Corp.	8.00	0.35%	0.36%	\$33,146	\$14,592	39.86	0.14%	0.15%	\$12,958	\$5,653	\$66,349
C W Industries						16.04	0.06%	0.06%	\$5,215	\$2,275	\$7,489
C. K. Systematics, Inc.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Cabot Grouping						401.00	1.46%	1.60%			A
Cabot Beryco						143.00	0.52%	0.54%			A
Cabot Wrought Products						27.00	0.10%	0.10%			A
Cabot Company						13.00	0.05%	0.05%			A
Kawecki Beryco						218.00	0.79%	0.82%			A
Camel Metals						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Cantol Inc.						20.09	0.07%	0.08%	\$6,531	\$2,849	\$9,380
Carvel Hall Inc.						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Chem Cell Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Chem Par						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Chem-Solv						2.00	0.01%	0.01%	\$650	\$284	\$934
Chester County Intermediate Unit						0.07	0.00%	0.00%			D
Chobert Associates						85.15	0.31%	0.32%	\$27,682	\$12,075	\$39,757
Chrono-Log Corporation						6.28	0.02%	0.02%	\$2,042	\$891	\$2,932
Cincinnati Time						1.00	0.00%	0.00%			D
Classic Coachworks						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Clifton Precision	34.00	1.49%	1.52%	\$140,870	\$62,015	82.00	0.30%	0.31%	\$26,658	\$11,629	\$241,172
Coatings For Industry Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Cobra Wire & Cable Co.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party

AR000111

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Concurrent Computer Corp.						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Connecticut Mixed						12.00	0.04%	0.00%	\$0	\$0	B
Container Research Corporation						83.00	0.30%	0.31%	\$26,983	\$11,771	\$38,754
Contamination Control, Inc.						20.00	0.07%	0.07%	\$6,502	\$2,836	\$9,338
Continental Vanguard, Inc.						65.45	0.24%	0.25%			C
Control Switch	3.00	0.13%	0.00%	\$0	\$0	32.48	0.12%	0.00%	\$0	\$0	B
Controls Service & Engineering						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Cook Specialty Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Crown Marketing Equipment Co.						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
Cyprus Foote Mineral Co.						495.00	1.79%	1.85%			A
Danco Tool & Mold Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Data Media Inc						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
David K. Robson, Inc.						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Decision Data						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Defense Reutilization & Marketing Grouping						349.98	1.27%	1.31%			A
Madison, IN						13.00	0.05%	0.05%			A
DRMS/PNSY						200.72	0.73%	0.75%			A
DRMO PHILADELPHIA						54.00	0.20%	0.20%			A
Picatinny Arsenal						8.26	0.03%	0.03%			A
DRMO Knox						74.00	0.27%	0.28%			A
Delaware Container Co. Inc.						9.00	0.03%	0.00%	\$0	\$0	B
Delbar Products						328.50	1.19%	1.23%			A
Delco Wire & Cable, Inc./ Delco Elec.						47.00	0.17%	0.00%	\$0	\$0	B
Delmaco Mfg. Inc.						2.00	0.01%	0.01%	\$650	\$284	\$934
Deltron Incorporated						18.55	0.07%	0.07%	\$6,031	\$2,631	\$8,661
Dentronix, Inc.						8.04	0.03%	0.03%	\$2,614	\$1,140	\$3,754

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De minimis party

AR000112

**Malvern TCE Superfund Site**  
**Generator Volume Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Detra Flag Co.						10.22	0.04%	0.04%	\$3,322	\$1,449	\$4,772
DeVilbiss, Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Devon Apparel						1.00	0.00%	0.00%			D
Display Corporation of America						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Diversified Electronic Corp.						15.53	0.06%	0.06%	\$5,049	\$2,202	\$7,251
Dixon Industries Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Doehler - Jarvis						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Dorado Fabrics						119.00	0.43%	0.00%	\$0	\$0	B
Drexelbrook Engineering						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Durawood						1.00	0.00%	0.00%			D
Dynamic Services						2.00	0.01%	0.00%	\$0	\$0	B
E M R Photoelectric						3.00	0.01%	0.01%	\$975	\$425	\$1,401
E. Hopkins Co.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
E.I.T. Inc., Enterra Instrumentation Tech						4.51	0.02%	0.02%	\$1,466	\$640	\$2,106
E/M Corporation						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
East West Label Co. Inc.						49.50	0.18%	0.19%	\$16,092	\$7,020	\$23,112
Eaton	36.00	1.58%	1.61%	\$149,157	\$65,663	38.00	0.14%	0.14%	\$12,354	\$5,389	\$232,562
Elco Corporation	61.00	2.67%	2.73%	\$252,738	\$111,262	61.00	0.22%	0.23%	\$19,831	\$8,651	\$392,481
Electro Platers of York Inc.						199.36	0.72%	0.75%	\$64,811	\$28,272	\$93,083
Electro Tech Systems Inc.						1.00	0.00%	0.00%			D
Electroloy						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Electronic Display Systems/Hercules						224.00	0.81%	0.84%			A
Elisco						8.36	0.03%	0.03%	\$2,718	\$1,186	\$3,903
Emeco	3.00	0.13%	0.13%	\$12,430	\$5,472	3.00	0.01%	0.01%	\$975	\$425	\$19,302
Empire Abrasive & Equipment Corp.						103.80	0.38%	0.39%	\$33,745	\$14,720	\$48,465
Ervins Crafts						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Ext -Corporol						4.00	0.01%	0.00%	\$0	\$0	B

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party.

AR000113

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
F B F Industries Inc.						130.00	0.47%	0.49%	\$42,263	\$18,436	\$60,698
Fabric Development						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Fairchild Space Systems						1.00	0.00%	0.00%			D
Fairfax Cleaners						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Far East Foods						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Fendt Finding Co., Inc.						7.00	0.03%	0.00%	\$0	\$0	B
Fergusson						5.96	0.02%	0.02%	\$1,938	\$845	\$2,783
Fischer & Porter Co/Andrews Glass	93.00	4.07%	4.16%			794.50	2.88%	2.98%			A
Fluid Power, Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Formation Inc.						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
Formosa Plastics						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Franklin Mint						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Frazer-Volpe Corporation						23.82	0.09%	0.09%	\$7,744	\$3,378	\$11,122
Frontier Chemical Waste Process						3.00	0.01%	0.01%	\$975	\$425	\$1,401
G. K. Garrett Corp.						27.45	0.10%	0.10%	\$8,924	\$3,893	\$12,817
Gala Industries						3.55	0.01%	0.01%	\$1,154	\$503	\$1,658
Gas Springs						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Gateway Terminal						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
General Electric						191.00	0.69%	0.72%	\$62,094	\$27,086	\$89,180
General Motors Corporation	5.00	0.22%	0.22%			517.00	1.87%	1.94%			A
Giles & Ransome						112.00	0.41%	0.42%	\$36,411	\$15,883	\$52,294
Giltech Inc.						7.00	0.03%	0.00%	\$0	\$0	B
Glah Bros., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Globe Solvents						66.36	0.24%	0.00%	\$0	\$0	B
Gould Inc.						68.00	0.25%	0.25%	\$22,107	\$9,643	\$31,750
Graphic Packaging Corp.						59.57	0.22%	0.22%	\$19,366	\$8,448	\$27,814
Green Tweed Co.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335

\* Superseding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De minimis party.

AR000114

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Gulf & Western						2.00	0.01%	0.01%	\$650	\$284	\$934
H & L Cleaners						3.00	0.01%	0.00%	\$0	\$0	B
H - V Industries, Inc.						151.50	0.55%	0.57%	\$49,252	\$21,485	\$70,737
H I Services Inc.						1.00	0.00%	0.00%			D
Hahn Truck Sales						9.00	0.03%	0.00%	\$0	\$0	B
Hale Pumps, Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Hamilton Precision Metals						472.06	1.71%	1.77%			A
Hamilton Technology, Inc.						1234.00	4.47%	4.62%			A
Hamilton Watch Co.	197.00	8.63%	8.81%			904.00	3.27%	3.39%			A
Handy & Harman Tube Co. Inc						229.18	0.83%	0.86%			A
Heel Co.						31.00	0.11%	0.12%	\$10,078	\$4,396	\$14,474
Herman Goldner Co. Inc.						7.09	0.03%	0.03%	\$2,305	\$1,005	\$3,310
High Energy Company						84.64	0.31%	0.32%	\$27,516	\$12,003	\$39,519
Hollingsworth						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Honeywell Instruments						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Hough/Loew Associates						1.09	0.00%	0.00%			D
Hulltronics						2.00	0.01%	0.01%	\$650	\$284	\$934
Hurst Perf.						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Imperial Specialty						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Industrial Systems Design						2.64	0.01%	0.00%	\$0	\$0	B
Iron Bound Heat Treating Co.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
J W Rex Co.	21.00	0.92%	0.94%	\$87,008	\$38,303	86.00	0.31%	0.32%	\$27,958	\$12,196	\$165,466
J & J Spill						43.00	0.16%	0.16%			C
James Spring & Wire Co.	2.00	0.09%	0.09%	\$8,286	\$3,648	113.00	0.41%	0.42%	\$36,736	\$16,025	\$64,695
Jenson, Homer						0.36	0.00%	0.00%			D
Jetshapes Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
John Evan's & Sons, Inc.						203.29	0.74%	0.76%	\$66,089	\$28,829	\$94,918

\* Superceding 4/27/98 VRS

A De maximis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De micromis party

AR000115



**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Johnson Company						2.00	0.01%	0.01%	\$650	\$284	\$934
Johnson-Matthey						29.55	0.11%	0.11%	\$9,607	\$4,191	\$13,797
K - D Tool Manufacturing						95.00	0.34%	0.36%	\$30,884	\$13,472	\$44,357
K S M Fastening Systems Division						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
K S O Industries						12.00	0.04%	0.00%	\$0	\$0	B
Kawneer Corp.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Keystone Transformer						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Kim Manufacturing						283.00	1.03%	1.06%			A
Kosempel						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Krautkramer-Branson, Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Kutlicke & Soffa						18.54	0.07%	0.07%	\$6,027	\$2,629	\$8,657
L & S Tool and Machine Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
LaFrance Corp.	12.00	0.53%	0.54%			415.00	1.50%	1.55%			A
Laminators Inc.						29.00	0.11%	0.11%	\$9,428	\$4,113	\$13,540
Lancaster Machinery Co.						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
Lavelle Aircraft Co.						189.55	0.69%	0.71%	\$61,622	\$26,881	\$88,503
Leeds & Northrop						145.72	0.53%	0.55%	\$47,373	\$20,665	\$68,038
Lightman Drum Co.						0.27	0.00%	0.00%			C
Lincoln						3.00	0.01%	0.01%	\$975	\$425	\$1,401
London Harness & Cable Co.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Lovetkin Corporation						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Lowry's						2.55	0.01%	0.00%	\$0	\$0	B
M Q S Inspection Inc./Magnaflux						46.00	0.17%	0.17%	\$14,954	\$6,523	\$21,478
Mack Electric						0.27	0.00%	0.00%			D
Mack Wayne Plastics						12.00	0.04%	0.00%	\$0	\$0	B
Malco						94.04	0.34%	0.35%	\$30,572	\$13,336	\$43,908
Manorgraphics						36.84	0.13%	0.14%	\$11,977	\$5,224	\$17,201

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De minimis party

AR000116

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Mars Electronics Inc.						110.99	0.40%	0.42%	\$36,083	\$15,740	\$51,822
Mars Money Systems						1.00	0.00%	0.00%			D
Materials Electronic Products						81.00	0.29%	0.30%	\$26,333	\$11,487	\$37,820
Matheson Instrument						20.10	0.07%	0.08%	\$6,534	\$2,850	\$9,385
Matthew International						3.00	0.01%	0.01%	\$975	\$425	\$1,401
McClarin Plastics						195.04	0.71%	0.73%	\$63,407	\$27,659	\$91,066
McGee Industries Inc.						97.00	0.35%	0.36%	\$31,534	\$13,756	\$45,290
McHugh Railroad Maint Equip Co.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Meade Packaging						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Met Fin	7.00	0.31%	0.31%	\$29,003	\$12,768	7.00	0.03%	0.03%	\$2,276	\$993	\$45,039
Mida Development						57.50	0.21%	0.22%	\$18,693	\$8,154	\$26,847
Mida Manufacturing	8.00	0.35%	0.00%	\$0	\$0	16.00	0.06%	0.00%	\$0	\$0	B
Mitchell Specialty						20.00	0.07%	0.00%	\$0	\$0	B
Model Finishing						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Monitor Systems	4.00	0.18%	0.18%	\$16,573	\$7,296	4.00	0.01%	0.01%	\$1,300	\$567	\$25,736
Moore Products	73.00	3.20%	3.27%	\$302,456	\$133,150	73.00	0.26%	0.27%	\$23,732	\$10,352	\$469,691
Morning Call						355.00	1.29%	1.33%			A
N G K Metals						145.00	0.53%	0.54%	\$47,139	\$20,563	\$67,702
N W Controls	4.00	0.18%	0.18%			374.59	1.36%	1.40%			A
Napp Chemical						67.00	0.24%	0.25%	\$21,782	\$9,502	\$31,283
Narco Avionics						19.00	0.07%	0.07%	\$6,177	\$2,694	\$8,871
National Computer Systems						1.00	0.00%	0.00%			D
National Metal Crafters						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
National Products						1.00	0.00%	0.00%			D
National Solvents Inc.						156.00	0.57%	0.00%	\$0	\$0	B
Netzsch Inc.						110.00	0.40%	0.41%	\$35,761	\$15,599	\$51,360
Neutronics						10.00	0.04%	0.04%	\$3,251	\$1,418	\$4,669

\* Superseding 4/27/98 VRS

A De maximis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party

AR000117

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Ni-Chro						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Norco Finishing						11.00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
North Industrial Chemicals						60.00	0.22%	0.22%			C
North Penn Polishing & Plating						52.55	0.19%	0.20%	\$17,084	\$7,452	\$24,536
Olympic Tool & Machine Co.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Oxford Metal Products						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
P H L Inc.						2.00	0.01%	0.01%	\$650	\$284	\$934
P P & L Northern Div. S.C.						257.27	0.93%	0.96%			A
Paris Business Forms						2.00	0.01%	0.01%	\$650	\$284	\$934
Penflex Inc.	42.00	1.84%	1.88%	\$174,016	\$76,607	125.31	0.45%	0.47%	\$40,738	\$17,771	\$309,131
Penguin Industries						119.00	0.43%	0.45%	\$38,687	\$16,876	\$55,562
Penn Airborn Product						15.31	0.06%	0.06%	\$4,977	\$2,171	\$7,148
Penn Dye & Finishing						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Pennsbury Manufacturing						32.00	0.12%	0.00%	\$0	\$0	B
Pennwall Corp.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Penske V.D.A						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Pepco Manufacturing Co.						2.00	0.01%	0.01%	\$650	\$284	\$934
Peripheral Dynamics						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Perkin-Elmer						1.00	0.00%	0.00%			D
Permutit/Sybron Corp.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Peter Paul Cadbury Co.						2.00	0.01%	0.01%	\$650	\$284	\$934
Petrocon	35.00	1.53%	1.57%	\$145,013	\$63,839	35.00	0.13%	0.13%	\$11,378	\$4,963	\$225,194
Petter Engraving Inc.						2.04	0.01%	0.01%	\$663	\$289	\$952
Phila. Electric Co. Oregon Maint. Shops						34.45	0.12%	0.13%	\$11,200	\$4,885	\$16,085
Philadelphia Rust Proof Co. Inc.						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Philco Ford	6.00	0.26%	0.27%	\$24,859	\$10,944	6.00	0.02%	0.02%	\$1,951	\$851	\$38,605
Phillips & Jacob	4.00	0.18%	0.18%			4.00	0.01%	0.01%			C

\* Superseding 4/27/98 VRS

A De maximis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party

AR000118

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Photofabrication Chem & Equip						7.19	0.03%	0.03%	\$2,337	\$1,020	\$3,357
Photolastic Inc.	11.00	0.48%	0.49%	\$45,576	\$20,064	11.00	0.04%	0.04%	\$3,576	\$1,560	\$70,775
Pitman Corp.						47.00	0.17%	0.18%	\$15,280	\$6,665	\$21,945
Plate Crafters Inc.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Plymouth Tube	9.00	0.39%	0.40%			566.37	2.05%	2.12%			A
Pocono Foundry Inc.						1.00	0.00%	0.00%			D
Polysciences						184.00	0.67%	0.69%	\$59,818	\$26,094	\$85,912
Ponderosa Disposal Co.						10.00	0.04%	0.00%			C, B
Porter Instruments						228.27	0.83%	0.85%			A
Precision Arts Mfg.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Princo Instruments Inc.						79.00	0.29%	0.30%	\$25,683	\$11,203	\$36,886
Prodelin Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Pyco Inc.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Quaker City Chemicals	7.00	0.31%	0.31%			268.09	0.97%	1.00%			C, A
R & E Martin, Inc.						116.29	0.42%	0.44%			C
R C A	32.00	1.40%	1.43%	\$132,584	\$58,367	177.00	0.64%	0.66%	\$57,542	\$25,101	\$273,594
R C Kietzing						2.50	0.01%	0.01%	\$813	\$355	\$1,167
R D L Inc.						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
R. R. Donnelley & Sons, Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
Reilly Plating						430.00	1.56%	1.61%			A
Repco	9.00	0.39%	0.00%	\$0	\$0	14.00	0.05%	0.00%	\$0	\$0	B
Resource Technology Services, Inc.						473.72	1.72%	1.77%			C, A
Reynolds Cleaners						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Reynolds Metals						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Richard Hurst						4.08	0.01%	0.00%	\$0	\$0	B
S G L						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
S K F Industries Inc.						133.36	0.48%	0.50%	\$43,355	\$18,912	\$62,267

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De micromis party

AR000119

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
S P D Technologies						87.00	0.32%	0.33%	\$28,284	\$12,338	\$40,621
S P S Technologies						167.00	0.60%	0.63%	\$54,291	\$23,683	\$77,974
Sandvik, Inc.						70.90	0.26%	0.27%	\$23,049	\$10,055	\$33,104
Sanivan Labs						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Schmidt Brewery Co.						1.00	0.00%	0.00%			D
Schramm Inc.						1.00	0.00%	0.00%			D
Scotco Design Group Inc.						69.00	0.25%	0.26%	\$22,432	\$9,785	\$32,217
Scott Paper Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sermetal						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Shared Medical Systems						3.27	0.01%	0.01%	\$1,063	\$464	\$1,527
Sharples, Inc.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Shur-Kut Supply Corp.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Sikkens Co.						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Silvine						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Simco Company Inc.						4.52	0.02%	0.02%	\$1,469	\$641	\$2,110
Simon Wrecking Company Inc.	715.51	31.33%	32.00%			983.51	3.56%	3.68%			A
Simonetta Brothers						53.26	0.19%	0.00%	\$0	\$0	B
Simpson Sign Co.						16.52	0.06%	0.00%	\$0	\$0	B
Singer Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Solar Atmospheres						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Solitario						57.00	0.21%	0.00%	\$0	\$0	B
Solid State Scientific						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941
Sonic Instruments						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Specialty Castings Inc.						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Specialty Glass Products						1.00	0.00%	0.00%			D
Sperry Univac						2.00	0.01%	0.01%	\$650	\$284	\$934
Spra-Fin Inc.						72.41	0.26%	0.27%	\$23,540	\$10,269	\$33,809

\* Superseding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De minimis party

AR000120

**Malvern TCE - Refund Site**  
**Generator Volume Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Sprague-Griffiths Div.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Stein Seal Co.						138.00	0.50%	0.52%	\$44,863	\$19,570	\$64,434
Sterling Fleishman Co.						3.11	0.01%	0.01%	\$1,011	\$441	\$1,452
Storm Weather Products						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Sunroc Corp.	52.00	2.28%	2.33%			358.00	1.30%	1.34%			A
Suntemp Industries	9.00	0.39%	0.00%	\$0	\$0	9.00	0.03%	0.00%	\$0	\$0	B
Superior Metal Products						58.00	0.21%	0.22%	\$18,856	\$8,225	\$27,081
Superior Tube	21.00	0.92%	0.94%	\$87,008	\$38,303	71.00	0.26%	0.27%	\$23,082	\$10,069	\$158,462
Sweda/Hugin Group						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sweda/Litton						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Syntex/Star Grouping						725.00	2.63%	2.72%			A
Syntex Dental Products						115.00	0.42%	0.43%			A
Star Dental Corporation						610.00	2.21%	2.28%			A
Synthane Taylor Corp.						71.00	0.26%	0.27%	\$23,082	\$10,069	\$33,151
T R W Inc.						0.45	0.00%	0.00%			D
Techalloy Inc.						11.67	0.04%	0.04%	\$3,794	\$1,655	\$5,449
Technical Products						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Technitrol	10.00	0.44%	0.45%	\$41,432	\$18,240	10.00	0.04%	0.04%	\$3,251	\$1,418	\$64,341
Tele Dynamics						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Telegenix Inc.						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Thermoseal Glass Corporation						2.00	0.01%	0.01%	\$650	\$284	\$934
Thomson Engineering Co.	0.02	0.00%	0.00%			0.02	0.00%	0.00%			D
Transducer Systems Inc.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Trend Instruments						31.18	0.11%	0.12%	\$10,137	\$4,422	\$14,558
Troemner, Henry						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Tube Methods						1.00	0.00%	0.00%			D

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party

AR000121

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Tudor Tech Inc.						1.00	0.00%	0.00%			D
U S A Ardec						11.00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
U S Electronic Services Corp.	19.00	0.83%	0.00%	\$0	\$0	19.00	0.07%	0.00%	\$0	\$0	B
United Chem-Con Corp.						21.00	0.08%	0.00%	\$0	\$0	B
United Contamination Controls Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
USG Grouping						686.40	2.12%	2.20%			A
U S G Interiors						182.00	0.66%	0.68%			A
Floor Systems Inc.						71.40	0.26%	0.27%			A
Donn Corporation						292.00	1.06%	1.09%			A
Davey Products						41.00	0.15%	0.15%			A
Valley Forge Laboratories, Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Valley Forge Tape & Label Co.						122.36	0.44%	0.46%	\$39,779	\$17,352	\$57,131
Victualic Company of America						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Vishay Resistive Systems						241.00	0.87%	0.90%			A
Viz Manufacturing	104.00	4.55%	4.65%			819.84	2.97%	3.07%			A
Waste Conversion						104.00	0.38%	0.39%			C
Wave Energy Systems						3.00	0.01%	0.00%	\$0	\$0	B
Welding Co.						1.00	0.00%	0.00%			D
Welex Inc.						61.00	0.22%	0.23%	\$19,831	\$8,651	\$28,482
Westcode Inc.						28.22	0.10%	0.11%	\$9,174	\$4,002	\$13,176
Western Electric	139.00	6.09%	6.22%			2083.00	7.54%	7.80%			A
Westinghouse						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Wilkinson Industries						3.00	0.01%	0.00%	\$0	\$0	B
Wittronics						0.30	0.00%	0.00%			D
Woodstream Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Xynatech Inc.						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De minimis party

AR000122

**Malvern TCE 'erfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Yuasa-Exide Battery Corp.						18.13	0.07%	0.07%	\$5,894	\$2,571	\$8,465
Zenith Products Corp.						63.00	0.23%	0.24%	\$20,481	\$8,934	\$29,415
<b>De Minimis Total:</b>	<b>673.00</b>	<b>25.09%</b>	<b>23.48%</b>	<b>\$2,158,627</b>	<b>\$950,287</b>	<b>9854.37</b>	<b>35.69%</b>	<b>33.51%</b>	<b>\$2,795,132</b>	<b>\$1,219,287</b>	<b>\$7,123,333</b>
<b>Total:</b>	<b>2283.71</b>	<b>100.00%</b>	<b>100.00%</b>			<b>27608.87</b>	<b>100.00%</b>	<b>100.00%</b>			

AR000123

\* Superseding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De minimis party



**Malvern TCE Superfund Site**  
**Explanation Sheet for the Final Volumetric Ranking Summary (VRS)**

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) Final Volumetric Ranking Summary (VRS). Please refer to the example provided below for an illustration of the process used to calculate individual total payment.<sup>1</sup>

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
ABC Corporation	34	1.49 %	1.52 %	\$141,249	\$62,182	82	0.29 %	0.30 %	\$26,325	\$11,483	\$241,239

**PRP Name** = The name of the specific potentially responsible party (PRP). Subsidiaries may be listed separately from parent companies; therefore, please review the VRS in its entirety to identify company subsidiaries that may have done business with Chemclene Corporation.

**FDA Drums** = The total number for drums sent to the Site before August 1, 1975.

**FDA %** = The total number of drums sent by the PRP prior to August 1, 1975, divided by the total number of documented drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

**FDA Revised %** = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan<sup>2</sup> drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

**FDA Cost** = The FDA Revised % divided by 100 and multiplied by \$9,263,078, the total past cost<sup>3</sup> and estimated future cost associated with the FDA.

**FDA Premium** = The FDA Revised % divided by 100 and multiplied by the future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50%).

**MPA Drums** = The total number of drums received at the Site, regardless of the date, for which the PRP is responsible.

**MPA %** = The total number of drums sent by the PRP, regardless of date, divided by the total number of documented drums received by Chemclene Corporation, multiplied by 100.

**MPA Revised %** = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan drums<sup>2</sup> received by Chemclene Corporation, regardless of date, multiplied by 100.

**MPA Cost** = MPA Revised % divided by 100 and multiplied by \$8,680,799, the total past cost<sup>3</sup> and estimated future cost associated with the MPA.

**MPA Premium** = The MPA Revised % divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50%).

**Total Payment** = FDA Cost + FDA Premium + MPA Cost + MPA Premium.

<sup>1</sup> The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

<sup>2</sup> Non-orphan drums are drums for which there is either a viable generator or a viable broker/transporter.

<sup>3</sup> The total past cost for the Site as of June 17, 1997, is \$2,214,705.00. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA.

AR000091

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Western Electric	139.00	6.09%	6.22%			2083.00	7.54%	7.80%			A
Hamilton Technology, Inc.						1234.00	4.47%	4.62%			A
Simon Wrecking Company Inc.	715.51	31.33%	32.00%			983.51	3.56%	3.68%			A
Hamilton Watch Co.	197.00	8.63%	8.81%			904.00	3.27%	3.39%			A
Viz Manufacturing	104.00	4.55%	4.65%			819.84	2.97%	3.07%			A
Fischer & Porter Co/Andrews Glass	93.00	4.07%	4.16%			794.50	2.88%	2.98%			A
Syntex/Star Grouping											
Star Dental Corporation						610.00	2.21%	2.28%			D, A
Plymouth Tube	9.00	0.39%	0.40%			566.37	2.05%	2.12%			A
Armstrong Cork Co.						522.70	1.89%	1.96%			A
Burroughs Corp.	147.00	6.44%	6.58%			519.54	1.88%	1.95%			A
General Motors Corporation	5.00	0.22%	0.22%			517.00	1.87%	1.94%			A
Cyprus Foote Mineral Co.						495.00	1.79%	1.85%			A
Resource Technology Services, Inc.						473.72	1.72%	1.77%			C, A
Hamilton Precision Metals						472.06	1.71%	1.77%			A
Reilly Plating						430.00	1.56%	1.61%			A
LaFrance Corp.	12.00	0.53%	0.54%			415.00	1.50%	1.55%			A
N W Controls	4.00	0.18%	0.18%			374.59	1.36%	1.40%			A
Sunroc Corp.	52.00	2.28%	2.33%			358.00	1.30%	1.34%			A
Morning Call						355.00	1.29%	1.33%			A
Delbar Products						328.50	1.19%	1.23%			A
USG Grouping											
Donn Corporation						292.00	1.06%	1.09%			D, A

\* Superseding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If a company appears under a grouping, please refer to the combined entities throughout Alphabetical Volumetric Ranking Summary.

E De minimis party.

AR000092

**Malvern TCE Refund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Kim Manufacturing						283.00	1.03%	1.06%			A
ALCOA	40.00	1.75%	1.79%			275.00	1.00%	1.03%			A
Quaker City Chemicals	7.00	0.31%	0.31%			268.09	0.97%	1.00%			C, A
P P & L Northern Div. S.C.						257.27	0.93%	0.96%			A
Aydin						251.82	0.91%	0.94%			A
Beckett Corporation						250.55	0.91%	0.94%			A
A. S. Koch Corp.	137.00	6.00%	6.13%			250.00	0.91%	0.94%			A
Vishay Resistive Systems						241.00	0.87%	0.90%			A
Handy & Harman Tube Co. Inc						229.18	0.83%	0.86%			A
Porter Instruments						228.27	0.83%	0.85%			A
Electronic Display Systems/Hercules						224.00	0.81%	0.84%			A
Action Manufacturing Company	49.18	2.15%	2.20%			220.31	0.80%	0.83%			A
Cabot Grouping											
Kawecki Beryco						218.00	0.79%	0.82%			D, A
John Evan's & Sons, Inc.						203.29	0.74%	0.76%	\$66,089	\$28,829	\$94,918
Defense Reutilization & Marketing Grouping											
DRMS/PNSY						200.72	0.73%	0.75%			D, A
Electro Platers of York Inc.						199.36	0.72%	0.75%	\$64,811	\$28,272	\$93,083
McClarin Plastics						195.04	0.71%	0.73%	\$63,407	\$27,659	\$91,066
General Electric						191.00	0.69%	0.72%	\$62,094	\$27,086	\$89,180
Lavelle Aircraft Co.						189.55	0.69%	0.71%	\$61,622	\$26,881	\$88,503
Polysciences						184.00	0.67%	0.69%	\$59,818	\$26,094	\$85,912

\* Superceding 4/27/98 VRS

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D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.

E De micromis party.

AR000093

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
<b>USG Grouping</b>											
U S G Interiors						182.00	0.66%	0.68%			D, A
R C A	32.00	1.40%	1.43%	\$132,584	\$58,367	177.00	0.64%	0.66%	\$57,542	\$25,101	\$273,594
S P S Technologies						167.00	0.60%	0.63%	\$54,291	\$23,683	\$77,974
National Solvents Inc.						156.00	0.57%	0.00%	\$0	\$0	B
H - V Industries, Inc.						151.50	0.55%	0.57%	\$49,252	\$21,485	\$70,737
Leeds & Northrop						145.72	0.53%	0.55%	\$47,373	\$20,665	\$68,038
N G K Metals						145.00	0.53%	0.54%	\$47,139	\$20,563	\$67,702
<b>Cabot Grouping</b>											
Cabot Beryco						143.00	0.52%	0.54%			D, A
Stein Seal Co.						138.00	0.50%	0.52%	\$44,863	\$19,570	\$64,434
S K F Industries Inc.						133.36	0.48%	0.50%	\$43,355	\$18,912	\$62,267
Amp Corp.	34.00	1.49%	1.52%	\$140,870	\$62,015	133.00	0.48%	0.50%	\$43,238	\$18,861	\$264,984
Bishop Tube Co.	60.00	2.63%	2.68%	\$248,594	\$109,438	130.00	0.47%	0.49%	\$42,263	\$18,436	\$418,731
F B F Industries Inc.						130.00	0.47%	0.49%	\$42,263	\$18,436	\$60,698
Penflex Inc.	42.00	1.84%	1.88%	\$174,016	\$76,607	125.31	0.45%	0.47%	\$40,738	\$17,771	\$309,131
Valley Forge Tape & Label Co.						122.36	0.44%	0.46%	\$39,779	\$17,352	\$57,131
Dorado Fabrics						119.00	0.43%	0.00%	\$0	\$0	B
Penguin Industries						119.00	0.43%	0.45%	\$38,687	\$16,876	\$55,562
R & E Martin, Inc.						116.29	0.42%	0.44%			C
<b>Syntex/Star Grouping</b>											
Syntex Dental Products						115.00	0.42%	0.43%			D, A
James Spring & Wire Co.	2.00	0.09%	0.09%	\$8,286	\$3,648	113.00	0.41%	0.42%	\$36,736	\$16,025	\$64,695

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If company appears under a grouping, please refer to the combined entities throughout Alphabetical Volumetric Ranking Summary.

E ormis party.

AR0000094

**Malvern TCE Refund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Giles & Ransome						112.00	0.41%	0.42%	\$36,411	\$15,883	\$52,294
Mars Electronics Inc.						110.99	0.40%	0.42%	\$36,083	\$15,740	\$51,822
Netzsch Inc.						110.00	0.40%	0.41%	\$35,761	\$15,599	\$51,360
Waste Conversion						104.00	0.38%	0.39%			C
Empire Abrasive & Equipment Corp.						103.80	0.38%	0.39%	\$33,745	\$14,720	\$48,465
McGee Industries Inc.						97.00	0.35%	0.36%	\$31,534	\$13,756	\$45,290
K - D Tool Manufacturing						95.00	0.34%	0.36%	\$30,884	\$13,472	\$44,357
Malco						94.04	0.34%	0.35%	\$30,572	\$13,336	\$43,908
S P D Technologies						87.00	0.32%	0.33%	\$28,284	\$12,338	\$40,621
Acro Labels						86.00	0.31%	0.32%	\$27,958	\$12,196	\$40,154
J W Rex Co.	21.00	0.92%	0.94%	\$87,008	\$38,303	86.00	0.31%	0.32%	\$27,958	\$12,196	\$165,466
Chobert Associates						85.15	0.31%	0.32%	\$27,682	\$12,075	\$39,757
High Energy Company						84.64	0.31%	0.32%	\$27,516	\$12,003	\$39,519
Container Research Corporation						83.00	0.30%	0.31%	\$26,983	\$11,771	\$38,754
Clifton Precision	34.00	1.49%	1.52%	\$140,870	\$62,015	82.00	0.30%	0.31%	\$26,658	\$11,629	\$241,172
Materials Electronic Products						81.00	0.29%	0.30%	\$26,333	\$11,487	\$37,820
Princo Instruments Inc.						79.00	0.29%	0.30%	\$25,683	\$11,203	\$36,886
Aston-Hill Co.						74.00	0.27%	0.00%	\$0	\$0	B
<b>Defense Reutilization &amp; Marketing Grouping</b>											
DRMO Knox						74.00	0.27%	0.28%			D, A
Moore Products	73.00	3.20%	3.27%	\$302,456	\$133,150	73.00	0.26%	0.27%	\$23,732	\$10,352	\$469,691
Spra-Fin Inc.						72.41	0.26%	0.27%	\$23,540	\$10,269	\$33,809
<b>USG Grouping</b>											
Floor Systems Inc.						71.40	0.26%	0.27%			D, A

\* Superseding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.

E De micromis party.

AR000095

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Superior Tube	21.00	0.92%	0.94%	\$87,008	\$38,303	71.00	0.26%	0.27%	\$23,082	\$10,069	\$158,462
Synthane Taylor Corp.						71.00	0.26%	0.27%	\$23,082	\$10,069	\$33,151
Sandvik, Inc.						70.90	0.26%	0.27%	\$23,049	\$10,055	\$33,104
Amchem						70.00	0.25%	0.26%	\$22,757	\$9,927	\$32,684
Scotco Design Group Inc.						69.00	0.25%	0.26%	\$22,432	\$9,785	\$32,217
Gould Inc.						68.00	0.25%	0.25%	\$22,107	\$9,643	\$31,750
Napp Chemical						67.00	0.24%	0.25%	\$21,782	\$9,502	\$31,283
Globe Solvents						66.36	0.24%	0.00%	\$0	\$0	B
Continental Vanguard, Inc.						65.45	0.24%	0.25%			C
Zenith Products Corp.						63.00	0.23%	0.24%	\$20,481	\$8,934	\$29,415
Elco Corporation	61.00	2.67%	2.73%	\$252,738	\$111,262	61.00	0.22%	0.23%	\$19,831	\$8,651	\$392,481
Welex Inc.						61.00	0.22%	0.23%	\$19,831	\$8,651	\$28,482
North Industrial Chemicals						60.00	0.22%	0.22%			C
Graphic Packaging Corp.						59.57	0.22%	0.22%	\$19,366	\$8,448	\$27,814
Superior Metal Products						58.00	0.21%	0.22%	\$18,856	\$8,225	\$27,081
Mida Development						57.50	0.21%	0.22%	\$18,693	\$8,154	\$26,847
Solatario						57.00	0.21%	0.00%	\$0	\$0	B
Defense Reutilization & Marketing Grouping											
DRMO PHILADELPHIA						54.00	0.20%	0.20%			D, A
Simonetta Brothers						53.26	0.19%	0.00%	\$0	\$0	B
North Penn Polishing & Plating						52.55	0.19%	0.20%	\$17,084	\$7,452	\$24,536
Ark Products	5.00	0.22%	0.22%	\$20,716	\$9,120	52.00	0.19%	0.19%	\$16,905	\$7,374	\$54,115
East West Label Co. Inc.						49.50	0.18%	0.19%	\$16,092	\$7,020	\$23,112
Delco Wire & Cable, Inc./ Delco Elec.						47.00	0.17%	0.00%	\$0	\$0	B

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D Company appears under a grouping, please refer to the combined entities throughout Alphabetical Volumetric Ranking Summary.

E De minimis party.

AR000096

**Malvern TCE Refund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Pitman Corp.						47.00	0.17%	0.18%	\$15,280	\$6,665	\$21,945
M Q S Inspection Inc /Magnaflux						46.00	0.17%	0.17%	\$14,954	\$6,523	\$21,478
A & L Handles						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
J & J Spill						43.00	0.16%	0.16%			C, A
Lancaster Machinery Co.						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
Ametek, Inc.	9.00	0.39%	0.40%	\$37,289	\$16,416	42.18	0.15%	0.16%	\$13,713	\$5,982	\$73,399
Athena Controls						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Biddle Instrument Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Cook Specialty Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
USG Grouping											
Davey Products						41.00	0.15%	0.15%			D, A
Adelphia Graphics Systems						40.05	0.15%	0.15%	\$13,020	\$5,680	\$18,700
C S S International Corp.	8.00	0.35%	0.36%	\$33,146	\$14,592	39.86	0.14%	0.15%	\$12,958	\$5,653	\$66,349
Chem Par						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Formosa Plastics						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Xynatech Inc.						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Eaton	36.00	1.58%	1.61%	\$149,157	\$65,663	38.00	0.14%	0.14%	\$12,354	\$5,389	\$232,562
Asplundh Manufac. Co.						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Brumbaugh Industries						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Carvel Hall Inc						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Manorgraphics						36.84	0.13%	0.14%	\$11,977	\$5,224	\$17,201
Allister Mig.						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Decision Data						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Petrocon	35.00	1.53%	1.57%	\$145,013	\$63,839	35.00	0.13%	0.13%	\$11,378	\$4,963	\$225,194

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.

E De micromis party

AR000097

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Phila. Electric Co. Oregon Maint. Shops						34.45	0.12%	0.13%	\$11,200	\$4,885	\$16,085
Accuracy Scientific	3.00	0.13%	0.13%	\$12,430	\$5,472	34.18	0.12%	0.13%	\$11,112	\$4,847	\$33,861
Electroloy						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Specialty Castings Inc.						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Control Switch	3.00	0.13%	0.00%	\$0	\$0	32.48	0.12%	0.00%	\$0	\$0	B
B. P. Oil						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941
Pennsbury Manufacturing						32.00	0.12%	0.00%	\$0	\$0	B
Solid State Scientific						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941
Trend Instruments						31.18	0.11%	0.12%	\$10,137	\$4,422	\$14,558
Heel Co.						31.00	0.11%	0.12%	\$10,078	\$4,396	\$14,474
Display Corporation of America						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Telegenix Inc.						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Johnson-Matthey						29.55	0.11%	0.11%	\$9,607	\$4,191	\$13,797
Laminators Inc.						29.00	0.11%	0.11%	\$9,428	\$4,113	\$13,540
Westcode Inc.						28.22	0.10%	0.11%	\$9,174	\$4,002	\$13,176
Anchor Darling Co.						28.00	0.10%	0.10%	\$9,103	\$3,971	\$13,074
G. K. Garrett Corp.						27.45	0.10%	0.10%	\$8,924	\$3,893	\$12,817
Cabot Grouping											
Cabot Wrought Products						27.00	0.10%	0.10%			D, A
Jetshapes Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
R. R. Donnelley & Sons, Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
Kawneer Corp.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
London Harness & Cable Co.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Storm Weather Products						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140

\* Superseding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

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D If company appears under a grouping, please refer to the combined entities throughout Alphabetical Volumetric Ranking Summary.

E De minimis party.

AR000098



**Malvern TCE      erfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Accumetrics						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Model Finishing						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Sweda/Litton						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Frazer-Volpe Corporation						23.82	0.09%	0.09%	\$7,744	\$3,378	\$11,122
Amuneal Mfg. Co.						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Gas Springs						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
R D L Inc.						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Westinghouse						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Beemer Engineering	4.00	0.18%	0.18%	\$16,573	\$7,296	22.00	0.08%	0.08%	\$7,152	\$3,120	\$34,141
Bendtru Company						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Camdel Metals						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Data Media Inc						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Philadelphia Rust Proof Co. Inc.						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
United Chem-Con Corp.						21.00	0.08%	0.00%	\$0	\$0	B
Matheson Instrument						20.10	0.07%	0.08%	\$6,534	\$2,850	\$9,385
Cantol Inc.						20.09	0.07%	0.08%	\$6,531	\$2,849	\$9,380
Contamination Control, Inc.						20.00	0.07%	0.07%	\$6,502	\$2,836	\$9,338
Mitchell Specialty						20.00	0.07%	0.00%	\$0	\$0	B
Narco Avionics						19.00	0.07%	0.07%	\$6,177	\$2,694	\$8,871
U S Electronic Services Corp.	19.00	0.83%	0.00%	\$0	\$0	19.00	0.07%	0.00%	\$0	\$0	B
Deltron Incorporated						18.55	0.07%	0.07%	\$6,031	\$2,631	\$8,661
Kulicke & Soffa						18.54	0.07%	0.07%	\$6,027	\$2,629	\$8,657
Yuasa-Exide Battery Corp.						18.13	0.07%	0.07%	\$5,894	\$2,571	\$8,465
David K. Robson, Inc.						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Sikkens Co.						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Airworks						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937

\* Superceding 4/27/98 VRS

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C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.

E De micromis party.

AR000099

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
C. K. Systematics, Inc.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Cobra Wire & Cable Co						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Oxford Metal Products						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Pennwalt Corp.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Transducer Systems Inc.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Simpson Sign Co.						16.52	0.06%	0.00%	\$0	\$0	B
C W Industries						16.04	0.06%	0.06%	\$5,215	\$2,275	\$7,489
Mida Manufacturing	8.00	0.35%	0.00%	\$0	\$0	16.00	0.06%	0.00%	\$0	\$0	B
National Metal Crafters						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Olympic Tool & Machine Co.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Plate Crafters Inc.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Sharpley, Inc.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Diversified Electronic Corp.						15.53	0.06%	0.06%	\$5,049	\$2,202	\$7,251
Penn Airborn Product						15.31	0.06%	0.06%	\$4,977	\$2,171	\$7,148
Aero Plating						15.00	0.05%	0.00%	\$0	\$0	B
Concurrent Computer Corp.						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Gateway Terminal						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Penn Dye & Finishing						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Sonic Instruments						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Classic Coachworks						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Hurst Perf.						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Repco	9.00	0.39%	0.00%	\$0	\$0	14.00	0.05%	0.00%	\$0	\$0	B
Technical Products						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Boekel Industries						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Bunnell Plastics, Inc.						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070

\* Superceding 4/27/98 VRS

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E De minimis party.

AR000100

**Malvern TCE      erfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
<b>Cabot Grouping</b>											
Cabot Company						13.00	0.05%	0.05%			D, A
<b>Defense Reutilization &amp; Marketing Grouping</b>											
Madison, IN						13.00	0.05%	0.05%			D, A
<b>E/M Corporation</b>						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
<b>Fabric Development</b>						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
<b>Imperial Specialty</b>						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
<b>Kosempel</b>						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
<b>Bo Peep Cleaners</b>						12.63	0.05%	0.05%	\$4,106	\$1,791	\$5,897
<b>Connecticut Mixed</b>						12.00	0.04%	0.00%	\$0	\$0	B
<b>Crown Marketing Equipment Co.</b>						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
<b>Formation Inc.</b>						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
<b>K S O Industries</b>						12.00	0.04%	0.00%	\$0	\$0	B
<b>Mack Wayne Plastics</b>						12.00	0.04%	0.00%	\$0	\$0	B
<b>Techalloy Inc.</b>						11.67	0.04%	0.04%	\$3,794	\$1,655	\$5,449
<b>Norco Finishing</b>						11.00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
<b>Photolastic Inc.</b>	11.00	0.48%	0.49%	\$45,576	\$20,064	11.00	0.04%	0.04%	\$3,576	\$1,560	\$70,775
<b>U S A Ardec</b>						11.00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
<b>Dettra Flag Co.</b>						10.22	0.04%	0.04%	\$3,322	\$1,449	\$4,772
<b>Ames Supply</b>						10.00	0.04%	0.00%	\$0	\$0	B
<b>Neutronics</b>						10.00	0.04%	0.04%	\$3,251	\$1,418	\$4,669
<b>Ponderosa Disposal Co.</b>						10.00	0.04%	0.00%			C, B
<b>Technitrol</b>	10.00	0.44%	0.45%	\$41,432	\$18,240	10.00	0.04%	0.04%	\$3,251	\$1,418	\$64,341
<b>A I W Frank</b>						9.92	0.04%	0.00%	\$0	\$0	B
<b>Agitar, Div. of Air Buensod, Inc.</b>						9.00	0.03%	0.00%	\$0	\$0	B

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E De micromis party.

AR000101

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
American Electronics Laboratories						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Delaware Container Co. Inc.						9.00	0.03%	0.00%	\$0	\$0	B
DeVilbiss, Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Hahn Truck Sales						9.00	0.03%	0.00%	\$0	\$0	B
Prodelin Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Reynolds Metals						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Sprague-Griffiths Div.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Suntemp Industries	9.00	0.39%	0.00%	\$0	\$0	9.00	0.03%	0.00%	\$0	\$0	B
Victualic Company of America						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Elisco						8.36	0.03%	0.03%	\$2,718	\$1,186	\$3,903
<b>Defense Reutilization &amp; Marketing Grouping</b>											
Picalinny Arsenal						8.26	0.03%	0.03%			D, A
Dentronix, Inc.						8.04	0.03%	0.03%	\$2,614	\$1,140	\$3,754
A & J Screw Machine Products						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Berg Laboratories						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Drexelbrook Engineering						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Fairfax Cleaners						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Meade Packaging						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Penske V.D.A						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Photofabrication Chem & Equip						7.19	0.03%	0.03%	\$2,337	\$1,020	\$3,357
Herman Goldner Co. Inc.						7.09	0.03%	0.03%	\$2,305	\$1,005	\$3,310
Bilgram Gear Company						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Fendt Finding Co., Inc.						7.00	0.03%	0.00%	\$0	\$0	B
Giltech Inc.						7.00	0.03%	0.00%	\$0	\$0	B

\* Superceding 4/27/98 VRS

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D If company appears under a grouping, please refer to the combined entities throughout Alphabetical Volumetric Ranking Summary.

E De minimis party.

AR000102

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Hollingsworth						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Iron Bound Heat Treating Co.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Krautkramer-Branson, Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Met Fin	7.00	0.31%	0.31%	\$29,003	\$12,768	7.00	0.03%	0.03%	\$2,276	\$993	\$45,039
Shur-Kut Supply Corp.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Silvine						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Valley Forge Laboratories, Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Chrono-Log Corporation						6.28	0.02%	0.02%	\$2,042	\$891	\$2,932
ADEC						6.00	0.02%	0.00%	\$0	\$0	B
Alfa-Laval Separation, Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Angelo						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Coatings For Industry Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Fluid Power, Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Franklin Mint						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
K S M Fastening Systems Division						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Lovekin Corporation						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Philco Ford	6.00	0.26%	0.27%	\$24,859	\$10,944	6.00	0.02%	0.02%	\$1,951	\$851	\$38,605
Sermetal						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Tele Dynamics						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Fergusson						5.96	0.02%	0.02%	\$1,938	\$845	\$2,783
Boyetown Packing Co.						5.27	0.02%	0.02%	\$1,713	\$747	\$2,461
Brandt Corporation						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Controls Service & Engineering						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Dixon Industries Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Ervin Crafts						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Green Tweed Co.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335

\* Superceding 4/27/98 VRS

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E De micromis party.

AR000103

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Honeywell Instruments						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Pyco Inc.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Reynolds Cleaners						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Woodstream Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Simco Company Inc.						4.52	0.02%	0.02%	\$1,469	\$641	\$2,110
E.I.T. Inc., Enterra Instrumentation Tech						4.51	0.02%	0.02%	\$1,466	\$640	\$2,106
Richard Hurst						4.08	0.01%	0.00%	\$0	\$0	B
Airline Hydraulic Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
AMF Head Division						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Artco Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Auto-Pack						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Chem Cell Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Doehler - Jarvis						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
E. Hopkins Co.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Ext -Corporol						4.00	0.01%	0.00%	\$0	\$0	B
Far East Foods						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Hale Pumps, Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Keystone Transformer						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
McHugh Railroad Maint Equip Co.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Monitor Systems	4.00	0.18%	0.18%	\$16,573	\$7,296	4.00	0.01%	0.01%	\$1,300	\$567	\$25,736
Phillips & Jacob	4.00	0.18%	0.18%			4.00	0.01%	0.01%			C
S G L						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sanivan Labs						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Scott Paper Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Solar Atmospheres						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sweda/Hugin Group						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868

\* Superceding 4/27/98 VRS

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D If company appears under a grouping, please refer to the combined entities throughout Alphabetical Volumetric Ranking Summary.

E De minimis party.

AR000104

**Malvern TCE      erfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
United Contamination Controls Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Gala Industries						3.55	0.01%	0.01%	\$1,154	\$503	\$1,658
Shared Medical Systems						3.27	0.01%	0.01%	\$1,063	\$464	\$1,527
Sterling Fleishman Co.						3.11	0.01%	0.01%	\$1,011	\$441	\$1,452
A. Johnson & Co., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Brooks Instrument						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Danco Tool & Mold Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
E M R Photoelectric						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Emeco	3.00	0.13%	0.13%	\$12,430	\$5,472	3.00	0.01%	0.01%	\$975	\$425	\$19,302
Frontier Chemical Waste Process						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Glah Bros., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
H & L Cleaners						3.00	0.01%	0.00%	\$0	\$0	B
L & S Tool and Machine Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Lincoln						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Matthew International						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Ni-Chro						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Peripheral Dynamics						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Permut/Sybron Corp.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Precision Arts Mfg.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Singer Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Troemner, Henry						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Wave Energy Systems						3.00	0.01%	0.00%	\$0	\$0	B
Wilkinson Industries						3.00	0.01%	0.00%	\$0	\$0	B
Industrial Systems Design						2.64	0.01%	0.00%	\$0	\$0	B
Lowry's						2.55	0.01%	0.00%	\$0	\$0	B
R C Kletzing						2.50	0.01%	0.01%	\$813	\$355	\$1,167

\* Superseding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.

E De micromis party.

AR000105

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Petter Engraving Inc.						2.04	0.01%	0.01%	\$663	\$289	\$952
Boeing Property						2.00	0.01%	0.01%	\$650	\$284	\$934
Brittany's Ltd.						2.00	0.01%	0.00%	\$0	\$0	B
Chem-Solv						2.00	0.01%	0.01%	\$650	\$284	\$934
Delmaco Mfg. Inc.						2.00	0.01%	0.01%	\$650	\$284	\$934
Dynamic Services						2.00	0.01%	0.00%	\$0	\$0	B
Gulf & Western						2.00	0.01%	0.01%	\$650	\$284	\$934
Hulltronics						2.00	0.01%	0.01%	\$650	\$284	\$934
Johnson Company						2.00	0.01%	0.01%	\$650	\$284	\$934
P H L Inc.						2.00	0.01%	0.01%	\$650	\$284	\$934
Paris Business Forms						2.00	0.01%	0.01%	\$650	\$284	\$934
Pepco Manufacturing Co.						2.00	0.01%	0.01%	\$650	\$284	\$934
Peter Paul Cadbury Co.						2.00	0.01%	0.01%	\$650	\$284	\$934
Sperry Univac						2.00	0.01%	0.01%	\$650	\$284	\$934
Thermoseal Glass Corporation						2.00	0.01%	0.01%	\$650	\$284	\$934
Albright Paper & Box Corp.						1.11	0.00%	0.00%			E
Hough/Loew Associates						1.09	0.00%	0.00%			E
A. Duie Pyle						1.00	0.00%	0.00%			E
Ace Service Corp.						1.00	0.00%	0.00%			E
Antenna Corp.						1.00	0.00%	0.00%			E
Cincinnati Time						1.00	0.00%	0.00%			E
Devon Apparel						1.00	0.00%	0.00%			E
Durawood						1.00	0.00%	0.00%			E
Electro Tech Systems Inc.						1.00	0.00%	0.00%			E
Fairchild Space Systems						1.00	0.00%	0.00%			E
H I Services Inc.						1.00	0.00%	0.00%			E

\* Superseding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If company appears under a grouping, please refer to the combined entities throughout Alphabetical Volumetric Ranking Summary.

E De minimis party.

AR000106



**Malvern TCE      erfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Mars Money Systems						1.00	0.00%	0.00%			E
National Computer Systems						1.00	0.00%	0.00%			E
National Products						1.00	0.00%	0.00%			E
Perkin-Elmer						1.00	0.00%	0.00%			E
Pocono Foundry Inc.						1.00	0.00%	0.00%			E
Schmidt Brewery Co.						1.00	0.00%	0.00%			E
Schramm Inc.						1.00	0.00%	0.00%			E
Specialty Glass Products						1.00	0.00%	0.00%			E
Tube Methods						1.00	0.00%	0.00%			E
Tudor Tech Inc.						1.00	0.00%	0.00%			E
Welding Co.						1.00	0.00%	0.00%			E
T R W Inc.						0.45	0.00%	0.00%			E
Budd Co.						0.36	0.00%	0.00%			E
Jenson, Homer						0.36	0.00%	0.00%			E
Wittronics						0.30	0.00%	0.00%			E
Lightman Drum Co.						0.27	0.00%	0.00%			C
Mack Electric						0.27	0.00%	0.00%			E
Chester County Intermediate Unit						0.07	0.00%	0.00%			E
Thomson Engineering Co.	0.02	0.00%	0.00%			0.02	0.00%	0.00%			E
<b>De Minimis Total:</b>	<b>673.00</b>	<b>25.00%</b>	<b>23.48%</b>	<b>\$2,168,627</b>	<b>\$860,287</b>	<b>9864.37</b>	<b>36.69%</b>	<b>33.61%</b>	<b>\$2,795,132</b>	<b>\$1,219,287</b>	<b>\$7,123,333</b>
<b>Total:</b>	<b>2283.71</b>	<b>100.00%</b>	<b>100.00%</b>			<b>27608.87</b>	<b>100.00%</b>	<b>100.00%</b>			

AR000107

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.

E De micromis party

**Malvern TCE Superfund Site**  
**Explanation Sheet for the Final Volumetric Ranking Summary (VRS)**

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) Final Volumetric Ranking Summary (VRS). Please refer to the example provided below for an illustration of the process used to calculate individual total payment.<sup>1</sup>

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
ABC Corporation	34	1.49 %	1.52 %	\$141,249	\$62,182	82	0.29 %	0.30 %	\$26,325	\$11,483	\$241,239

**PRP Name** = The name of the specific potentially responsible party (PRP). Subsidiaries may be listed separately from parent companies; therefore, please review the VRS in its entirety to identify company subsidiaries that may have done business with Chemclene Corporation.

**FDA Drums** = The total number for drums sent to the Site before August 1, 1975.

**FDA %** = The total number of drums sent by the PRP prior to August 1, 1975, divided by the total number of documented drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

**FDA Revised %** = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan<sup>2</sup> drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

**FDA Cost** = The FDA Revised % divided by 100 and multiplied by \$9,263,078, the total past cost<sup>3</sup> and estimated future cost associated with the FDA.

**FDA Premium** = The FDA Revised % divided by 100 and multiplied by the future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50%).

**MPA Drums** = The total number of drums received at the Site, regardless of the date, for which the PRP is responsible.

**MPA %** = The total number of drums sent by the PRP, regardless of date, divided by the total number of documented drums received by Chemclene Corporation, multiplied by 100.

**MPA Revised %** = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan drums<sup>2</sup> received by Chemclene Corporation, regardless of date, multiplied by 100.

**MPA Cost** = MPA Revised % divided by 100 and multiplied by \$8,680,799, the total past cost<sup>3</sup> and estimated future cost associated with the MPA.

**MPA Premium** = The MPA Revised % divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50%).

**Total Payment** = FDA Cost + FDA Premium + MPA Cost + MPA Premium.

<sup>1</sup> The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

<sup>2</sup> Non-orphan drums are drums for which there is either a viable generator or a viable broker/transporter.

<sup>3</sup> The total past cost for the Site as of June 17, 1997, is \$2,214,705.00. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA.

AR000124

**Malvern TCI      erfund Site**  
**Broker/Transporter Volumetric Ranking Summary\***

PRP Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Broker/ Transporter Total Payment	Generator Total De Minimis Payment	Total De Minimis Payment
Continental Vanguard, Inc.						89.36	0.32%	0.33%	\$29,062	\$12,677	\$41,739	\$30,571	\$72,310
Ekdredge, Inc.						549.53	1.99%	2.06%					A
F T C Hazardous						89.91	0.33%	0.34%	\$29,240	\$12,755	\$41,996	\$0	\$41,996
Inland Pumping & Dredging Corp.						67.00	0.24%	0.00%					B
J & J Spill						115.54	0.42%	0.43%	\$37,576	\$16,391	\$53,967	\$20,085	\$74,052
Keystone-Block Transportation						723.27	2.62%	2.71%					A
Lightman Drum Co.						48.00	0.17%	0.18%	\$15,611	\$6,810	\$22,420	\$126	\$22,546
North Industrial Chemicals						24.00	0.09%	0.09%	\$7,805	\$3,405	\$11,210	\$28,025	\$39,235
P Q Corporation						67.00	0.24%	0.25%	\$21,790	\$9,505	\$31,295	\$0	\$31,295
Philadelphia Steel Drum Co. Inc.						43.00	0.16%	0.16%	\$13,984	\$6,100	\$20,085	\$0	\$20,085
Phillips & Jacob	20.00	0.86%	0.89%	\$82,865	\$36,479	20.00	0.07%	0.07%	\$6,504	\$2,837	\$128,686	\$25,804	\$154,490
Ponderosa Disposal Co.						111.00	0.40%	0.00%					B
Quaker City Chemicals	52.00	2.28%	2.33%			333.11	1.21%	1.25%					A
R & E Martin, Inc.						55.00	0.20%	0.21%	\$17,887	\$7,803	\$25,690	\$54,317	\$80,007
Resource Technology Services, Inc.						206.27	0.75%	0.77%					A
Waste Conversion						38.00	0.14%	0.14%	\$12,358	\$5,391	\$17,749	\$97,154	\$114,903
Waste Consulting & Brokerage						5.36	0.02%	0.02%	\$1,743	\$760	\$2,504	\$0	\$2,504
U.S. Environmental Services						4.00	0.01%	0.01%	\$1,301	\$567	\$1,868	\$0	\$1,868
<b>Total:</b>	<b>72.00</b>	<b>3.16%</b>	<b>3.22%</b>	<b>\$82,865</b>	<b>\$36,479</b>	<b>2689.36</b>	<b>9.38%</b>	<b>9.62%</b>	<b>\$184,881</b>	<b>\$86,001</b>	<b>\$390,289</b>	<b>\$266,082</b>	<b>\$656,291</b>

\* Superceding 4/27/98 VRS

A Party does not qualify for *de minimis* settlement offer.

B Party has been identified as an orphan.

AR000125

**MALVERN TCE SITE DeMINIMIS**

**CONSENT ORDER**

# **APPENDIX D**

**Malvern TCE Superfund Site**  
**Explanation Sheet for the Second Round De Minimis Settlement - Volumetric Ranking Summaries**

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) New Volumetric Ranking Summary (VRS) for the Second Round De Minimis Settlement. This New VRS for the Second Round De Minimis Settlement supplants the VRS dated 11/30/98 only in reference to the parties eligible for this Second Round De Minimis Settlement.<sup>1</sup>

PRP Name = The name of the specific potentially responsible party (PRP).

FDA Drums = The total number of drums sent to the Site by each PRP before August 1, 1975.

FDA % = The total number of drums sent by the PRP to the Site prior to August 1, 1975, divided by the total number of documented drums received by Chemelene prior to August 1, 1975, multiplied by 100.

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan<sup>2</sup> drums received by Chemelene Corporation prior to August 1, 1975, multiplied by 100.

FDA Cost = The FDA Revised % divided by 100 and multiplied by \$10,544,199.49, the total past costs<sup>3</sup> and estimated future cost associated with the FDA.

FDA Premium = The FDA Revised % divided by 100 and multiplied by future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50% plus an additional 10% for those parties who were offered but declined to participate in the 1999 de minimis settlement).

MPA Drums = The total number of drums sent by each PRP, regardless of the date.

MPA % = The total number of drums sent by the PRP, regardless of date, divided by the total number of documented drums received by Chemelene Corporation, multiplied by 100.

MPA Revised % = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan<sup>2</sup> drums received by Chemelene Corporation, multiplied by 100.

MPA Cost = MPA Revised % divided by 100 and multiplied by \$9,961,900.49, the total past cost<sup>3</sup> and estimated future cost associated with the MPA.

MPA Premium = The MPA Revised %, divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50% plus an additional 10% for those parties who were offered but declined to participate in the 1999 de minimis settlement).

Total Payment = The sum of the FDA Cost, FDA Premium, MPA Cost, and MPA Premium.

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<sup>1</sup> The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

<sup>2</sup> Non-orphan drums are drums for which there was either a viable generator or a viable broker/transporter as of November 30, 1998.

<sup>3</sup> The total past cost for the Site as of October 3, 2000 is \$4,776,948.97. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA.

**Malvern TCE Superfund Site  
Second De Minimis Settlement  
Volumetric Ranking Summary  
(Descending)**

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
Elco Corporation	61.00	2.67%	2.73%	\$287,692	\$133,514	61.00	0.22%	0.23%	\$22,010	\$10,372	\$453,589
R & E Martin						171.29	0.62%	0.64%	\$61,805	\$29,125	\$90,931
Technitrol	10.00	0.44%	0.45%	\$47,163	\$18,240	10.00	0.04%	0.04%	\$3,608	\$1,417	\$70,428
K-D Tool Manufacturing Co						95.00	0.34%	0.36%	\$34,278	\$16,153	\$50,432
Maida Development						57.5	0.21%	0.22%	\$20,747	\$9,777	\$30,524
Boekel Industries						13.00	0.05%	0.05%	\$4,691	\$2,210	\$6,901
American Electronics Laboratories						9.00	0.03%	0.03%	\$3,247	\$1,530	\$4,778
Photofabrication Chemical & Equipment						7.19	0.03%	0.03%	\$2,594	\$1,223	\$3,817
Ervin's Crafts						5.00	0.02%	0.02%	\$1,804	\$850	\$2,654
McHugh Railroad Maint. Equip. Co.						4.00	0.01%	0.01%	\$1,443	\$680	\$2,123
Total	71					432.98					\$716,177

**Malvern TCE Superfund Site  
Second Round De Minimis Settlement  
Volumetric Ranking Summary  
(Alphabetical by PRP)**

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
American Electronics Laboratories						9.00	0.03%	0.03%	\$3,247	\$1,530	\$4,778
Boekel Industries						13.00	0.05%	0.05%	\$4,691	\$2,210	\$6,901
Elco Corporation	61.00	2.67%	2.73%	\$287,692	\$133,514	61.00	0.22%	0.23%	\$22,010	\$10,372	\$453,589
Ervin's Crafts						5.00	0.02%	0.02%	\$1,804	\$850	\$2,654
K- D Tool Manufacturing						95.00	0.34%	0.36%	\$34,278	\$16,153	\$50,432
Maida Development						57.5	0.21%	0.22%	\$20,747	\$9,777	\$30,524
McHugh Railroad Maint. Equip. Co.						4.00	0.01%	0.01%	\$1,443	\$680	\$2,123
Photofabrication Chemical & Equipment						7.19	0.03%	0.03%	\$2,594	\$1,223	\$3,817
R & E Martin						171.29	0.62%	0.64%	\$61,805	\$29,125	\$90,931
Technitrol	10	0.44%	0.45%	\$47,163	\$18,240	10	0.04%	0.04%	\$3,608	\$1,417	\$70,428
Total	71					432.98					\$716,177

**Malvern TCE Site De Minimis Offer**

# **ATTACHMENT**

# **C**



**Malvern TCE Superfund Site**  
**Explanation Sheet for the Final Volumetric Ranking Summary (VRS)**

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) Final Volumetric Ranking Summary (VRS). Please refer to the example provided below for an illustration of the process used to calculate individual total payment.<sup>1</sup>

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
ABC Corporation	34	1.49 %	1.52 %	\$141,249	\$62,182	82	0.29 %	0.30 %	\$26,325	\$11,483	\$241,239

**PRP Name** = The name of the specific potentially responsible party (PRP). Subsidiaries may be listed separately from parent companies; therefore, please review the VRS in its entirety to identify company subsidiaries that may have done business with Chemclene Corporation.

**FDA Drums** = The total number for drums sent to the Site before August 1, 1975.

**FDA %** = The total number of drums sent by the PRP prior to August 1, 1975, divided by the total number of documented drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

**FDA Revised %** = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan<sup>2</sup> drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

**FDA Cost** = The FDA Revised % divided by 100 and multiplied by \$9,263,078, the total past cost<sup>3</sup> and estimated future cost associated with the FDA.

**FDA Premium** = The FDA Revised % divided by 100 and multiplied by the future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50%).

**MPA Drums** = The total number of drums received at the Site, regardless of the date, for which the PRP is responsible.

**MPA %** = The total number of drums sent by the PRP, regardless of date, divided by the total number of documented drums received by Chemclene Corporation, multiplied by 100.

**MPA Revised %** = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan drums<sup>2</sup> received by Chemclene Corporation, regardless of date, multiplied by 100.

**MPA Cost** = MPA Revised % divided by 100 and multiplied by \$8,680,799, the total past cost<sup>3</sup> and estimated future cost associated with the MPA.

**MPA Premium** = The MPA Revised % divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50%).

**Total Payment** = FDA Cost + FDA Premium + MPA Cost + MPA Premium.

<sup>1</sup> The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

<sup>2</sup> Non-orphan drums are drums for which there is either a viable generator or a viable broker/transporter.

<sup>3</sup> The total past cost for the Site as of June 17, 1997, is \$2,214,705.00. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA.

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Western Electric	139.00	6.09%	6.22%			2083.00	7.54%	7.80%			A
Hamilton Technology, Inc.						1234.00	4.47%	4.62%			A
Simon Wrecking Company Inc.	715.51	31.33%	32.00%			983.51	3.56%	3.68%			A
Hamilton Watch Co.	197.00	8.63%	8.81%			904.00	3.27%	3.39%			A
Viz Manufacturing	104.00	4.55%	4.65%			819.84	2.97%	3.07%			A
Fischer & Porter Co/Andrews Glass	93.00	4.07%	4.16%			794.50	2.88%	2.98%			A
Syntex/Star Grouping											
Star Dental Corporation						610.00	2.21%	2.28%			D, A
Plymouth Tube	9.00	0.39%	0.40%			566.37	2.05%	2.12%			A
Armstrong Cork Co.						522.70	1.89%	1.96%			A
Burroughs Corp.	147.00	6.44%	6.58%			519.54	1.88%	1.95%			A
General Motors Corporation	5.00	0.22%	0.22%			517.00	1.87%	1.94%			A
Cyprus Foote Mineral Co.						495.00	1.79%	1.85%			A
Resource Technology Services, Inc.						473.72	1.72%	1.77%			C, A
Hamilton Precision Metals						472.06	1.71%	1.77%			A
Reilly Plating						430.00	1.56%	1.61%			A
LaFrance Corp.	12.00	0.53%	0.54%			415.00	1.50%	1.55%			A
N W Controls	4.00	0.18%	0.18%			374.59	1.36%	1.40%			A
Sunroc Corp.	52.00	2.28%	2.33%			358.00	1.30%	1.34%			A
Morning Call						355.00	1.29%	1.33%			A
Delbar Products						328.50	1.19%	1.23%			A
USG Grouping											
Donn Corporation						292.00	1.06%	1.09%			D, A

\* Superseding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If a company appears under a grouping, please refer to the combined entities throughout Alphabetical Volumetric Ranking Summary.

E De minimis party.

AR000092

**Malvern TCE Refund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Kim Manufacturing						283.00	1.03%	1.06%			A
ALCOA	40.00	1.75%	1.79%			275.00	1.00%	1.03%			A
Quaker City Chemicals	7.00	0.31%	0.31%			268.09	0.97%	1.00%			C, A
P P & L Northern Div. S.C.						257.27	0.93%	0.96%			A
Aydin						251.82	0.91%	0.94%			A
Beckett Corporation						250.55	0.91%	0.94%			A
A. S. Koch Corp.	137.00	6.00%	6.13%			250.00	0.91%	0.94%			A
Vishay Resistive Systems						241.00	0.87%	0.90%			A
Handy & Harman Tube Co. Inc						229.18	0.83%	0.86%			A
Porter Instruments						228.27	0.83%	0.85%			A
Electronic Display Systems/Hercules						224.00	0.81%	0.84%			A
Action Manufacturing Company	49.18	2.15%	2.20%			220.31	0.80%	0.83%			A
Cabot Grouping											
Kawecki Berylco						218.00	0.79%	0.82%			D, A
John Evan's & Sons, Inc.						203.29	0.74%	0.76%	\$66,089	\$28,829	\$94,918
Defense Reutilization & Marketing Grouping											
DRMS/PNSY						200.72	0.73%	0.75%			D, A
Electro Platers of York Inc.						199.36	0.72%	0.75%	\$64,811	\$28,272	\$93,083
McClarin Plastics						195.04	0.71%	0.73%	\$63,407	\$27,659	\$91,066
General Electric						191.00	0.69%	0.72%	\$62,094	\$27,086	\$89,180
Lavelle Aircraft Co.						189.55	0.69%	0.71%	\$61,622	\$26,881	\$88,503
Polysciences						184.00	0.67%	0.69%	\$59,818	\$26,294	\$86,112

\* Superseding 4/27/98 VRS

A De maximis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.

E De micromis party.

AR000093

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
USG Grouping											
U S G Interiors						182.00	0.66%	0.68%			D, A
R C A	32.00	1.40%	1.43%	\$132,584	\$58,367	177.00	0.64%	0.66%	\$57,542	\$25,101	\$273,594
S P S Technologies						167.00	0.60%	0.63%	\$54,291	\$23,683	\$77,974
National Solvents Inc.						156.00	0.57%	0.00%	\$0	\$0	B
H - V Industries, Inc.						151.50	0.55%	0.57%	\$49,252	\$21,485	\$70,737
Leeds & Northrop						145.72	0.53%	0.55%	\$47,373	\$20,665	\$68,038
N G K Metals						145.00	0.53%	0.54%	\$47,139	\$20,563	\$67,702
Cabot Grouping											
Cabot Berylo						143.00	0.52%	0.54%			D, A
Stein Seal Co.						138.00	0.50%	0.52%	\$44,863	\$19,570	\$64,434
S K F Industries Inc.						133.38	0.48%	0.50%	\$43,355	\$18,912	\$62,267
Amp Corp.	34.00	1.49%	1.52%	\$140,870	\$62,015	133.00	0.48%	0.50%	\$43,238	\$18,861	\$264,984
Bishop Tube Co.	60.00	2.63%	2.68%	\$248,594	\$109,438	130.00	0.47%	0.49%	\$42,263	\$18,436	\$418,731
F B F Industries Inc.						130.00	0.47%	0.49%	\$42,263	\$18,436	\$60,698
Penflex Inc.	42.00	1.84%	1.88%	\$174,016	\$76,607	125.31	0.45%	0.47%	\$40,738	\$17,771	\$309,131
Valley Forge Tape & Label Co.						122.38	0.44%	0.46%	\$39,779	\$17,352	\$57,131
Dorado Fabrics						119.00	0.43%	0.00%	\$0	\$0	B
Penguin Industries						119.00	0.43%	0.45%	\$38,687	\$13,876	\$55,562
R & E Martin, Inc.						116.29	0.42%	0.44%			C
Syntex/Star Grouping											
Syntex Dental Products						115.00	0.42%	0.43%			D, A
James Spring & Wire Co.	2.00	0.09%	0.09%	\$8,286	\$3,648	113.00	0.41%	0.42%	\$36,736	\$16,025	\$64,695

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If company appears under a grouping, please refer to the combined entities throughout Alphabetical Volumetric Ranking Summary.

E Orphan party.

AR000094

**Malvern TCE Refund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Giles & Ransome						112.00	0.41%	0.42%	\$36,411	\$15,883	\$52,294
Mars Electronics Inc.						110.99	0.40%	0.42%	\$36,083	\$15,740	\$51,822
Netzsch Inc.						110.00	0.40%	0.41%	\$35,761	\$15,599	\$51,360
Waste Conversion						104.00	0.38%	0.39%			C
Empire Abrasive & Equipment Corp.						103.80	0.38%	0.39%	\$33,745	\$14,720	\$48,465
McGee Industries Inc.						97.00	0.35%	0.36%	\$31,534	\$13,756	\$45,290
K - D Tool Manufacturing						95.00	0.34%	0.36%	\$30,884	\$13,472	\$44,357
Malco						94.04	0.34%	0.35%	\$30,572	\$13,336	\$43,908
S P D Technologies						87.00	0.32%	0.33%	\$28,284	\$12,338	\$40,621
Acro Labels						86.00	0.31%	0.32%	\$27,958	\$12,196	\$40,154
J W Rex Co.	21.00	0.92%	0.94%	\$87,008	\$38,303	86.00	0.31%	0.32%	\$27,958	\$12,196	\$165,466
Chobert Associates						85.15	0.31%	0.32%	\$27,682	\$12,075	\$39,757
High Energy Company						84.64	0.31%	0.32%	\$27,516	\$12,003	\$39,519
Container Research Corporation						83.00	0.30%	0.31%	\$26,983	\$11,771	\$38,754
Clifton Precision	34.00	1.49%	1.52%	\$140,870	\$62,015	82.00	0.30%	0.31%	\$26,658	\$11,629	\$241,172
Materials Electronic Products						81.00	0.29%	0.30%	\$26,333	\$11,487	\$37,820
Princo Instruments Inc.						79.00	0.29%	0.30%	\$25,683	\$11,203	\$36,886
Aston-Hill Co.						74.00	0.27%	0.00%	\$0	\$0	B
Defense Reutilization & Marketing Grouping											
DRMO Knox						74.00	0.27%	0.28%			D, A
Moore Products	73.00	3.20%	3.27%	\$302,456	\$133,150	73.00	0.26%	0.27%	\$23,732	\$10,352	\$469,691
Spra-Fin Inc.						72.41	0.26%	0.27%	\$23,540	\$10,269	\$33,809
USG Grouping											
Floor Systems Inc.						71.40	0.26%	0.27%			D, A

\* Superseding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

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D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.

E De micromis party.

AR000095

**Malvern TCE Superfund Site  
Generator Volumetric Ranking Summary\***  
(By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Superior Tube	21.00	0.92%	0.94%	\$87,008	\$38,303	71.00	0.26%	0.27%	\$23,082	\$10,069	\$158,462
Synthane Taylor Corp.						71.00	0.26%	0.27%	\$23,082	\$10,069	\$33,151
Sandvik, Inc.						70.90	0.26%	0.27%	\$23,049	\$10,055	\$33,104
Amchem						70.00	0.25%	0.26%	\$22,757	\$9,927	\$32,684
Scolco Design Group Inc.						69.00	0.25%	0.26%	\$22,432	\$9,785	\$32,217
Gould Inc.						68.00	0.25%	0.25%	\$22,107	\$9,643	\$31,750
Napp Chemical						67.00	0.24%	0.25%	\$21,782	\$9,502	\$31,283
Globe Solvents						66.36	0.24%	0.00%	\$0	\$0	B
Continental Vanguard, Inc.						65.45	0.24%	0.25%			C
Zenith Products Corp.						63.00	0.23%	0.24%	\$20,481	\$8,934	\$29,415
Elco Corporation	61.00	2.67%	2.73%	\$252,738	\$111,262	61.00	0.22%	0.23%	\$19,831	\$8,651	\$392,481
Welex Inc.						61.00	0.22%	0.23%	\$19,831	\$8,651	\$28,482
North Industrial Chemicals						60.00	0.22%	0.22%			C
Graphic Packaging Corp.						59.57	0.22%	0.22%	\$19,366	\$8,448	\$27,814
Superior Metal Products						58.00	0.21%	0.22%	\$18,856	\$8,225	\$27,081
Mida Development						57.50	0.21%	0.22%	\$18,693	\$8,154	\$26,847
Solatario						57.00	0.21%	0.00%	\$0	\$0	B
Defense Reutilization & Marketing Grouping DRMO PHILADELPHIA						54.00	0.20%	0.20%			D, A
Simonetta Brothers						53.26	0.19%	0.00%	\$0	\$0	B
North Penn Polishing & Plating						52.55	0.19%	0.20%	\$17,084	\$7,452	\$24,536
Ark Products	5.00	0.22%	0.22%	\$20,716	\$9,120	52.00	0.19%	0.19%	\$16,905	\$7,374	\$54,115
East West Label Co. Inc.						49.50	0.18%	0.19%	\$16,092	\$7,020	\$23,112
Delco Wire & Cable, Inc./ Delco Elec.						47.00	0.17%	0.00%	\$0	\$0	B

\* Superceding 4/27/98 VRS

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B Party has been identified as an orphan.

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D Company appears under a grouping, please refer to the combined entities through Alphabetical Volumetric Ranking Summary.

E De minimis party.

AR000096

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Pitman Corp.						47.00	0.17%	0.18%	\$15,280	\$6,665	\$21,945
M Q S Inspection Inc./Magnaflux						46.00	0.17%	0.17%	\$14,954	\$6,523	\$21,478
A & L Handles						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
J & J Spill						43.00	0.16%	0.16%			C, A
Lancaster Machinery Co.						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
Ametek, Inc.	9.00	0.39%	0.40%	\$37,289	\$16,416	42.18	0.15%	0.16%	\$13,713	\$5,982	\$73,399
Athena Controls						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Biddle Instrument Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Cook Specialty Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
USG Grouping											
Davey Products						41.00	0.15%	0.15%			D, A
Adelphia Graphics Systems						40.05	0.15%	0.15%	\$13,020	\$5,680	\$18,700
C S S International Corp.	8.00	0.35%	0.36%	\$33,148	\$14,592	39.88	0.14%	0.15%	\$12,958	\$5,653	\$66,349
Chem Par						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Formosa Plastics						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Xynatech Inc.						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Eaton	36.00	1.58%	1.61%	\$149,157	\$65,663	38.00	0.14%	0.14%	\$12,354	\$5,389	\$232,562
Asplundh Manufac. Co.						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Brumbaugh Industries						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Carvel Hall Inc						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Manorgraphics						36.84	0.13%	0.14%	\$11,977	\$5,224	\$17,201
Allister Mfg.						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Decision Data						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Petrocon	35.00	1.53%	1.57%	\$145,013	\$63,839	35.00	0.13%	0.13%	\$11,378	\$4,963	\$225,194

\* Superceding 4/27/98 VRS

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B Party has been identified as an orphan

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D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.

E De micromis party

AR000097

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Phila. Electric Co. Oregon Maint. Shops						34.45	0.12%	0.13%	\$11,200	\$4,885	\$16,085
Accuracy Scientific	3.00	0.13%	0.13%	\$12,430	\$5,472	34.18	0.12%	0.13%	\$11,112	\$4,847	\$33,861
Electroloy						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Specialty Castings Inc.						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Control Switch	3.00	0.13%	0.00%	\$0	\$0	32.48	0.12%	0.00%	\$0	\$0	B
B. P. Oil						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941
Pennsbury Manufacturing						32.00	0.12%	0.00%	\$0	\$0	B
Solid State Scientific						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941
Trend Instruments						31.18	0.11%	0.12%	\$10,137	\$4,422	\$14,558
Heel Co.						31.00	0.11%	0.12%	\$10,078	\$4,396	\$14,474
Display Corporation of America						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Telegenix Inc.						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Johnson-Matthey						29.55	0.11%	0.11%	\$9,607	\$4,191	\$13,797
Laminators Inc.						29.00	0.11%	0.11%	\$9,428	\$4,113	\$13,540
Westcode Inc.						28.22	0.10%	0.11%	\$9,174	\$4,002	\$13,176
Anchor Darling Co.						28.00	0.10%	0.10%	\$9,103	\$3,971	\$13,074
G. K. Garrett Corp.						27.45	0.10%	0.10%	\$8,924	\$3,893	\$12,817
Cabot Grouping											
Cabot Wrought Products						27.00	0.10%	0.10%			D, A
Jetshapes Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
R. R. Donnelley & Sons, Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
Kawneer Corp.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
London Harness & Cable Co.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Storm Weather Products						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140

\* Superseding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

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D If company appears under a grouping, please refer to the combined entities through alphabetical Volumetric Ranking Summary.

E De minimis party.

AR000098



**Malvern TCE      erfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Accumetrics						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Model Finishing						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Sweda/Litton						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Frazer-Volpe Corporation						23.82	0.09%	0.09%	\$7,744	\$3,378	\$11,122
Amuneal Mfg. Co.						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Gas Springs						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
R D L Inc.						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Westinghouse						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Beemer Engineering	4.00	0.18%	0.18%	\$16,573	\$7,296	22.00	0.08%	0.08%	\$7,152	\$3,120	\$34,141
Bendru Company						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Candell Metals						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Data Media Inc.						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Philadelphia Rust Proof Co. Inc.						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
United Chem-Con Corp.						21.00	0.08%	0.00%	\$0	\$0	B
Matheson Instrument						20.10	0.07%	0.08%	\$6,534	\$2,850	\$9,385
Cantol Inc.						20.09	0.07%	0.08%	\$6,531	\$2,849	\$9,380
Contamination Control, Inc.						20.00	0.07%	0.07%	\$6,502	\$2,836	\$9,338
Mitchell Specialty						20.00	0.07%	0.00%	\$0	\$0	B
Narco Avionics						19.00	0.07%	0.07%	\$6,177	\$2,694	\$8,871
U S Electronic Services Corp.	19.00	0.83%	0.00%	\$0	\$0	19.00	0.07%	0.00%	\$0	\$0	B
Deltron Incorporated						18.55	0.07%	0.07%	\$6,031	\$2,631	\$8,661
Kulicke & Soffa						18.54	0.07%	0.07%	\$6,027	\$2,629	\$8,657
Yuasa-Exide Battery Corp.						18.13	0.07%	0.07%	\$5,894	\$2,571	\$8,465
David K. Robson, Inc.						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Silkens Co.						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Airworks						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937

\* Superseding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

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D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.

E De micromis party.

AR000099

**Malvern TCE Superfund Site  
Generator Volumetric Ranking Summary\***  
(By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
C. K. Systematics, Inc.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Cobra Wire & Cable Co.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Oxford Metal Products						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Pennwall Corp.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Transducer Systems Inc.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Simpson Sign Co.						16.52	0.06%	0.00%	\$0	\$0	B
C W Industries						16.04	0.06%	0.06%	\$5,215	\$2,275	\$7,489
Mide Manufacturing	8.00	0.35%	0.00%	\$0	\$0	16.00	0.06%	0.00%	\$0	\$0	B
National Metal Crafters						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Olympic Tool & Machine Co.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Plate Crafters Inc.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Sharples, Inc.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Diversified Electronic Corp.						15.53	0.06%	0.06%	\$5,049	\$2,202	\$7,251
Penn Airborn Product						15.31	0.06%	0.06%	\$4,977	\$2,171	\$7,148
Aero Plating						15.00	0.05%	0.00%	\$0	\$0	B
Concurrent Computer Corp.						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Gateway Terminal						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Penn Dye & Finishing						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Sonic Instruments						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Classic Coachworks						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Hurst Perf.						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Repco	9.00	0.39%	0.00%	\$0	\$0	14.00	0.05%	0.00%	\$0	\$0	B
Technical Products						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Boekel Industries						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Bunnell Plastics, Inc.						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070

\* Superceding 4/27/98 VRS

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B Party has been identified as an orphan.

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D If company appears under a grouping, please refer to the combined entities throughout Alphabetical Volumetric Ranking Summary.

E De minimis party.

AR000100

**Malvern TCE      erfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
<b>Cabot Grouping</b>											
Cabot Company						13.00	0.05%	0.05%			D, A
<b>Defense Reutilization &amp; Marketing Grouping</b>											
Madison, IN						13.00	0.05%	0.05%			D, A
<b>E/M Corporation</b>						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Fabric Development						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Imperial Specialty						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Kosempel						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Bo Peep Cleaners						12.63	0.05%	0.05%	\$4,106	\$1,791	\$5,897
Connecticut Mixed						12.00	0.04%	0.00%	\$0	\$0	B
Crown Marketing Equipment Co.						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
Formation Inc.						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
K S O Industries						12.00	0.04%	0.00%	\$0	\$0	B
Mack Wayne Plastics						12.00	0.04%	0.00%	\$0	\$0	B
Techalloy Inc.						11.67	0.04%	0.04%	\$3,794	\$1,655	\$5,449
Norco Finishing						11.00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
Photolastic Inc.	11.00	0.48%	0.49%	\$45,576	\$20,064	11.00	0.04%	0.04%	\$3,576	\$1,560	\$70,775
U S A Ardec						11.00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
Dettra Flag Co.						10.22	0.04%	0.04%	\$3,322	\$1,449	\$4,772
Ames Supply						10.00	0.04%	0.00%	\$0	\$0	B
Neutronics						10.00	0.04%	0.04%	\$3,251	\$1,418	\$4,669
Ponderosa Disposal Co.						10.00	0.04%	0.00%			C, B
Technitrol	10.00	0.44%	0.45%	\$41,432	\$18,240	10.00	0.04%	0.04%	\$3,251	\$1,418	\$64,341
AIW Frank						9.92	0.04%	0.00%	\$0	\$0	B
Agitar, Div. of Air Buensod, Inc.						9.00	0.03%	0.00%	\$0	\$0	B

\* Superseding 4/27/98 VRS

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D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.

E De micromis party.

AR000101

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
American Electronics Laboratories						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Delaware Container Co. Inc.						9.00	0.03%	0.00%	\$0	\$0	B
DeVilbiss, Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Hahn Truck Sales						9.00	0.03%	0.00%	\$0	\$0	B
Prodelin Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Reynolds Metals						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Sprague-Griffiths Div.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Suntemp Industries	9.00	0.39%	0.00%	\$0	\$0	9.00	0.03%	0.00%	\$0	\$0	B
Victualic Company of America						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Ellisco						8.36	0.03%	0.03%	\$2,718	\$1,166	\$3,903
Defense Reutilization & Marketing Grouping											
Picatinny Arsenal						8.26	0.03%	0.03%			D, A
Dentronix, Inc.						8.04	0.03%	0.03%	\$2,614	\$1,140	\$3,754
A & J Screw Machine Products						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Berg Laboratories						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Drexelbrook Engineering						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Fairfax Cleaners						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Meade Packaging						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Penske V.D.A.						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Photofabrication Chem. & Equip						7.19	0.03%	0.03%	\$2,337	\$1,020	\$3,357
Herman Goldner Co. Inc.						7.09	0.03%	0.03%	\$2,305	\$1,005	\$3,310
Bilgram Gear Company						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Fendt Finding Co., Inc.						7.00	0.03%	0.00%	\$0	\$0	B
Giltech Inc.						7.00	0.03%	0.00%	\$0	\$0	B

\* Superseding 4/27/98 VRS

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B Party has been identified as an orphan.

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D If company appears under a grouping, please refer to the combined entities throughout Alphabetical Volumetric Ranking Summary.

E De minimis party.

AR000102

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Holingsworth						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Iron Bound Heat Treating Co.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Krautkramer-Branson, Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Mel Fin	7.00	0.31%	0.31%	\$29,003	\$12,768	7.00	0.03%	0.03%	\$2,276	\$993	\$45,039
Shur-Kut Supply Corp.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Silvine						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Valley Forge Laboratories, Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Chrono-Log Corporation						6.28	0.02%	0.02%	\$2,042	\$891	\$2,932
ADEC						6.00	0.02%	0.00%	\$0	\$0	B
Alfa-Laval Separation, Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Angelo						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Coatings For Industry Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Fluid Power, Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Franklin Mint						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
K S M Fastening Systems Division						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Lovetkin Corporation						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Philco Ford	6.00	0.26%	0.27%	\$24,859	\$10,944	6.00	0.02%	0.02%	\$1,951	\$851	\$38,605
Sermetal						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Tele Dynamics						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Fergusson						5.98	0.02%	0.02%	\$1,938	\$845	\$2,783
Boyetown Packing Co.						5.27	0.02%	0.02%	\$1,713	\$747	\$2,461
Brandt Corporation						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Controls Service & Engineering						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Dixon Industries Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Ervins Crafts						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Green Tweed Co.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335

\* Superceding 4/27/98 VRS

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E De micromis party.

AR000103

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Honeywell Instruments						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Pyco Inc.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Reynolds Cleaners						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Woodstream Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Simco Company Inc.						4.52	0.02%	0.02%	\$1,469	\$641	\$2,110
E.I.T. Inc., Enterra Instrumentation Tech						4.51	0.02%	0.02%	\$1,466	\$640	\$2,106
Richard Hurst						4.08	0.01%	0.00%	\$0	\$0	B
Airline Hydraulic Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
AMF Head Division						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Arco Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Auto-Pack						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Chem Cell Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Doehler - Jarvis						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
E. Hopkins Co.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Ext -Corporol						4.00	0.01%	0.00%	\$0	\$0	B
Far East Foods						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Hale Pumps, Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Keystone Transformer						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
McHugh Railroad Maint Equip Co.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Monitor Systems	4.00	0.18%	0.18%	\$16,573	\$7,296	4.00	0.01%	0.01%	\$1,300	\$567	\$25,736
Phillips & Jacob	4.00	0.18%	0.18%			4.00	0.01%	0.01%			C
S G L						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sanivan Labs						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Scott Paper Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Solar Atmospheres						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sweda/Hugin Group						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868

\* Superseding 4/27/98 VRS

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E De minimis party.

AR000104

**Malvern TCE      erfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
United Contamination Controls Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Gala Industries						3.55	0.01%	0.01%	\$1,154	\$503	\$1,658
Shared Medical Systems						3.27	0.01%	0.01%	\$1,063	\$464	\$1,527
Sterling Fleishman Co.						3.11	0.01%	0.01%	\$1,011	\$441	\$1,452
A. Johnson & Co., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Brooks Instrument						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Danco Tool & Mold Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
E M R Photoelectric						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Emeco	3.00	0.13%	0.13%	\$12,430	\$5,472	3.00	0.01%	0.01%	\$975	\$425	\$19,302
Frontier Chemical Waste Process						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Glah Bros., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
H & L Cleaners						3.00	0.01%	0.00%	\$0	\$0	B
L & S Tool and Machine Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Lincoln						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Matthew International						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Ni-Chro						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Peripheral Dynamics						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Permutit/Sybron Corp.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Precision Arts Mfg.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Singer Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Troemner, Henry						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Wave Energy Systems						3.00	0.01%	0.00%	\$0	\$0	B
Wilkinson Industries						3.00	0.01%	0.00%	\$0	\$0	B
Industrial Systems Design						2.64	0.01%	0.00%	\$0	\$0	B
Lowry's						2.55	0.01%	0.00%	\$0	\$0	B
R C Kietzing						2.50	0.01%	0.01%	\$813	\$355	\$1,167

\* Superseding 4/27/98 VRS

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B Party has been identified as an orphan.

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E De micromis party.

AR000105

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Petter Engraving Inc.						2.04	0.01%	0.01%	\$663	\$289	\$952
Boeing Property						2.00	0.01%	0.01%	\$650	\$284	\$934
Brittany's Ltd.						2.00	0.01%	0.00%	\$0	\$0	B
Chem-Solv						2.00	0.01%	0.01%	\$650	\$284	\$934
Delmaco Mfg. Inc.						2.00	0.01%	0.01%	\$650	\$284	\$934
Dynamic Services						2.00	0.01%	0.00%	\$0	\$0	B
Gulf & Western						2.00	0.01%	0.01%	\$650	\$284	\$934
Hulltronics						2.00	0.01%	0.01%	\$650	\$284	\$934
Johnson Company						2.00	0.01%	0.01%	\$650	\$284	\$934
P H L Inc.						2.00	0.01%	0.01%	\$650	\$284	\$934
Paris Business Forms						2.00	0.01%	0.01%	\$650	\$284	\$934
Pepco Manufacturing Co.						2.00	0.01%	0.01%	\$650	\$284	\$934
Peter Paul Cadbury Co.						2.00	0.01%	0.01%	\$650	\$284	\$934
Sperry Univac						2.00	0.01%	0.01%	\$650	\$284	\$934
Thermoseal Glass Corporation						2.00	0.01%	0.01%	\$650	\$284	\$934
Albright Paper & Box Corp.						1.11	0.00%	0.00%			E
Hough/Loew Associates						1.09	0.00%	0.00%			E
A. Duie Pyle						1.00	0.00%	0.00%			E
Ace Service Corp.						1.00	0.00%	0.00%			E
Antenna Corp.						1.00	0.00%	0.00%			E
Cincinnati Time						1.00	0.00%	0.00%			E
Devon Apparel						1.00	0.00%	0.00%			E
Durawood						1.00	0.00%	0.00%			E
Electro Tech Systems Inc.						1.00	0.00%	0.00%			E
Fairchild Space Systems						1.00	0.00%	0.00%			E
H I Services Inc.						1.00	0.00%	0.00%			E

\* Superseding 4/27/98 VRS

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E De minimis party.

AR000106



**Malvern TCE      erfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Mars Money Systems						1.00	0.00%	0.00%			E
National Computer Systems						1.00	0.00%	0.00%			E
National Products						1.00	0.00%	0.00%			E
Perkin-Elmer						1.00	0.00%	0.00%			E
Pocono Foundry Inc.						1.00	0.00%	0.00%			E
Schmidt Brewery Co.						1.00	0.00%	0.00%			E
Schramm Inc.						1.00	0.08%	0.00%			E
Specialty Glass Products						1.00	0.00%	0.00%			E
Tube Methods						1.00	0.00%	0.00%			E
Tudor Tech Inc.						1.00	0.00%	0.00%			E
Welding Co.						1.00	0.00%	0.00%			E
T R W Inc.						0.45	0.00%	0.00%			E
Budd Co.						0.36	0.00%	0.00%			E
Jenson, Homer						0.36	0.00%	0.00%			E
Wiltronics						0.30	0.00%	0.00%			E
Lightman Drum Co.						0.27	0.00%	0.00%			C
Mack Electric						0.27	0.00%	0.00%			E
Chester County Intermediate Unit						0.07	0.00%	0.00%			E
Thomson Engineering Co.	0.02	0.00%	0.00%			0.02	0.00%	0.00%			E
<b>De Minimis Total:</b>	<b>673.00</b>	<b>26.08%</b>	<b>23.48%</b>	<b>\$2,168,627</b>	<b>\$960,287</b>	<b>9864.37</b>	<b>36.69%</b>	<b>33.61%</b>	<b>\$2,795,132</b>	<b>\$1,219,287</b>	<b>\$7,123,333</b>
<b>Total:</b>	<b>2283.71</b>	<b>100.00%</b>	<b>100.00%</b>			<b>27608.87</b>	<b>100.00%</b>	<b>100.00%</b>			

\* Superceding 4/27/98 VRS

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B Party has been identified as an orphan

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E De micromis party.

AR000107

**Malvern TCE Superfund Site**  
**Explanation Sheet for the Final Volumetric Ranking Summary (VRS)**

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) Final Volumetric Ranking Summary (VRS). Please refer to the example provided below for an illustration of the process used to calculate individual total payment.<sup>1</sup>

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
ABC Corporation	34	1.49 %	1.52 %	\$141,249	\$62,182	82	0.29 %	0.30 %	\$26,325	\$11,483	\$241,239

**PRP Name** = The name of the specific potentially responsible party (PRP). Subsidiaries may be listed separately from parent companies; therefore, please review the VRS in its entirety to identify company subsidiaries that may have done business with Chemclene Corporation.

**FDA Drums** = The total number for drums sent to the Site before August 1, 1975.

**FDA %** = The total number of drums sent by the PRP prior to August 1, 1975, divided by the total number of documented drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

**FDA Revised %** = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan<sup>2</sup> drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

**FDA Cost** = The FDA Revised % divided by 100 and multiplied by \$9,263,078, the total past cost<sup>3</sup> and estimated future cost associated with the FDA.

**FDA Premium** = The FDA Revised % divided by 100 and multiplied by the future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50%).

**MPA Drums** = The total number of drums received at the Site, regardless of the date, for which the PRP is responsible.

**MPA %** = The total number of drums sent by the PRP, regardless of date, divided by the total number of documented drums received by Chemclene Corporation, multiplied by 100.

**MPA Revised %** = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan drums<sup>2</sup> received by Chemclene Corporation, regardless of date, multiplied by 100.

**MPA Cost** = MPA Revised % divided by 100 and multiplied by \$8,680,799, the total past cost<sup>3</sup> and estimated future cost associated with the MPA.

**MPA Premium** = The MPA Revised % divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50%).

**Total Payment** = FDA Cost + FDA Premium + MPA Cost + MPA Premium.

<sup>1</sup> The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

<sup>2</sup> Non-orphan drums are drums for which there is either a viable generator or a viable broker/transporter.

<sup>3</sup> The total past cost for the Site as of June 17, 1997, is \$2,214,705.00. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA.

AR000108

**Malvern TCE Refund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
A & J Screw Machine Products						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
A & L Handles						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
A I W Frank						9.92	0.04%	0.00%	\$0	\$0	B
A. Duie Pyle						1.00	0.00%	0.00%			D
A. Johnson & Co., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
A. S. Koch Corp.	137.00	6.00%	6.13%			250.00	0.91%	0.94%			A
Accumetrics						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Accuracy Scientific	3.00	0.13%	0.13%	\$12,430	\$5,472	34.18	0.12%	0.13%	\$11,112	\$4,847	\$33,861
Ace Service Corp.						1.00	0.00%	0.00%			D
Acro Labels						86.00	0.31%	0.32%	\$27,958	\$12,196	\$40,154
Action Manufacturing Company	49.18	2.15%	2.20%			220.31	0.80%	0.83%			A
ADEC						6.00	0.02%	0.00%	\$0	\$0	B
Adelphia Graphics Systems						40.05	0.15%	0.15%	\$13,020	\$5,680	\$18,700
Aero Plating						15.00	0.05%	0.00%	\$0	\$0	B
Agitar, Div. of Air Buensod, Inc.						9.00	0.03%	0.00%	\$0	\$0	B
Airline Hydraulic Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Airworks						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Albright Paper & Box Corp.						1.11	0.00%	0.00%			D
ALCOA	40.00	1.75%	1.79%			275.00	1.00%	1.03%			A
Alfa-Laval Separation, Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Allister Mfg.						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Amchem						70.00	0.25%	0.26%	\$22,757	\$9,927	\$32,684
American Electronics Laboratories						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Ames Supply						10.00	0.04%	0.00%	\$0	\$0	B
Ametek, Inc.	9.00	0.39%	0.40%	\$37,289	\$16,416	42.18	0.15%	0.16%	\$13,713	\$5,982	\$73,399
AMF Head Division						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Amp Corp.	34.00	1.49%	1.52%	\$140,870	\$62,015	133.00	0.48%	0.50%	\$43,238	\$18,861	\$264,984

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party

AR000109

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Amuneal Mfg. Co.						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Anchor Darling Co.						28.00	0.10%	0.10%	\$9,103	\$3,971	\$13,074
Angelo						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Antenna Corp.						1.00	0.00%	0.00%			D
Ark Products	5.00	0.22%	0.22%	\$20,716	\$9,120	52.00	0.19%	0.19%	\$16,905	\$7,374	\$54,115
Armstrong Cork Co.						522.70	1.89%	1.96%			A
Artco Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Asplundh Manufac. Co.						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Aston-Hill Co.						74.00	0.27%	0.00%	\$0	\$0	B
Athena Controls						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Auto-Pack						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Aydin						251.82	0.91%	0.94%			A
B. P. Oil						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941
Beckett Corporation						250.55	0.91%	0.94%			A
Beemer Engineering	4.00	0.18%	0.18%	\$16,573	\$7,296	22.00	0.08%	0.08%	\$7,152	\$3,120	\$34,141
Bendtru Company						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Berg Laboratories						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Biddle Instrument Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Bilgram Gear Company						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Bishop Tube Co.	60.00	2.63%	2.68%	\$248,594	\$109,438	130.00	0.47%	0.49%	\$42,263	\$18,436	\$418,731
Bo Peep Cleaners						12.63	0.05%	0.05%	\$4,106	\$1,791	\$5,897
Boeing Property						2.00	0.01%	0.01%	\$650	\$284	\$934
Boekel Industries						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Boyetown Packing Co.						5.27	0.02%	0.02%	\$1,713	\$747	\$2,461
Brandt Corporation						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Brittany's Ltd.						2.00	0.01%	0.00%	\$0	\$0	B
Brooks Instrument						3.00	0.01%	0.01%	\$975	\$425	\$1,401

\* Superseding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party.

AR000110

**Malvern TCF Refund Site**  
**Generator Volume Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Brumbaugh Industries						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Budd Co.						0.36	0.00%	0.00%			D
Bunnell Plastics, Inc.						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Burroughs Corp.	147.00	6.44%	6.58%			519.54	1.88%	1.95%			A
C S S International Corp.	8.00	0.35%	0.36%	\$33,146	\$14,592	39.86	0.14%	0.15%	\$12,958	\$5,653	\$66,349
C W Industries						16.04	0.06%	0.06%	\$5,215	\$2,275	\$7,489
C. K. Systematics, Inc.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Cabot Grouping						401.00	1.46%	1.60%			A
Cabot Beryco						143.00	0.52%	0.54%			A
Cabot Wrought Products						27.00	0.10%	0.10%			A
Cabot Company						13.00	0.05%	0.05%			A
Kawecki Beryco						218.00	0.79%	0.82%			A
Camdel Metals						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Cantol Inc.						20.09	0.07%	0.08%	\$6,531	\$2,849	\$9,380
Carvel Hall Inc.						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Chem Cell Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Chem Par						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Chem-Solv						2.00	0.01%	0.01%	\$650	\$284	\$934
Chester County Intermediate Unit						0.07	0.00%	0.00%			D
Chobert Associates						85.15	0.31%	0.32%	\$27,682	\$12,075	\$39,757
Chrono-Log Corporation						6.28	0.02%	0.02%	\$2,042	\$891	\$2,932
Cincinnati Time						1.00	0.00%	0.00%			D
Classic Coachworks						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Clifton Precision	34.00	1.49%	1.52%	\$140,870	\$62,015	82.00	0.30%	0.31%	\$26,658	\$11,629	\$241,172
Coatings For Industry Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Cobra Wire & Cable Co.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937

\* Superseding 4/27/98 VRS

A De maximis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party

AR000111

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Concurrent Computer Corp.						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Connecticut Mixed						12.00	0.04%	0.00%	\$0	\$0	B
Container Research Corporation						83.00	0.30%	0.31%	\$26,983	\$11,771	\$38,754
Contamination Control, Inc.						20.00	0.07%	0.07%	\$6,502	\$2,836	\$9,338
Continental Vanguard, Inc.						65.45	0.24%	0.25%			C
Control Switch	3.00	0.13%	0.00%	\$0	\$0	32.48	0.12%	0.00%	\$0	\$0	B
Controls Service & Engineering						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Cook Specialty Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Crown Marketing Equipment Co.						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
Cyprus Foote Mineral Co.						495.00	1.79%	1.85%			A
Danco Tool & Mold Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Data Media Inc						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
David K. Robson, Inc.						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Decision Data						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Defense Reutilization & Marketing Grouping						349.98	1.27%	1.31%			A
Madison, IN						13.00	0.05%	0.05%			A
DRMS/PNSY						200.72	0.73%	0.75%			A
DRMO PHILADELPHIA						54.00	0.20%	0.20%			A
Picatinny Arsenal						8.26	0.03%	0.03%			A
DRMO Knox						74.00	0.27%	0.28%			A
Delaware Container Co. Inc.						9.00	0.03%	0.00%	\$0	\$0	B
Delbar Products						328.50	1.19%	1.23%			A
Delco Wire & Cable, Inc./ Delco Elec.						47.00	0.17%	0.00%	\$0	\$0	B
Delmaco Mfg. Inc.						2.00	0.01%	0.01%	\$650	\$284	\$934
Deltron Incorporated						18.55	0.07%	0.07%	\$6,031	\$2,631	\$8,661
Dentronix, Inc.						8.04	0.03%	0.03%	\$2,614	\$1,140	\$3,754

\* Superseding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party

AR000112

**Malvern TCE Superfund Site**  
**Generator Volume Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Dettra Flag Co.						10.22	0.04%	0.04%	\$3,322	\$1,449	\$4,772
DeVilbiss, Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Devon Apparel						1.00	0.00%	0.00%			D
Display Corporation of America						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Diversified Electronic Corp.						15.53	0.06%	0.06%	\$5,049	\$2,202	\$7,251
Dixon Industries Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Doehler - Jarvis						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Dorado Fabrics						119.00	0.43%	0.00%	\$0	\$0	B
Drexelbrook Engineering						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Durawood						1.00	0.00%	0.00%			D
Dynamic Services						2.00	0.01%	0.00%	\$0	\$0	B
E M R Photoelectric						3.00	0.01%	0.01%	\$975	\$425	\$1,401
E. Hopkins Co.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
E.I.T. Inc., Enterra Instrumentation Tech						4.51	0.02%	0.02%	\$1,466	\$640	\$2,106
E/M Corporation						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
East West Label Co. Inc.						49.50	0.18%	0.19%	\$16,092	\$7,020	\$23,112
Eaton	36.00	1.58%	1.61%	\$149,157	\$65,663	38.00	0.14%	0.14%	\$12,354	\$5,389	\$232,562
Elco Corporation	61.00	2.67%	2.73%	\$252,738	\$111,262	61.00	0.22%	0.23%	\$19,831	\$8,651	\$392,481
Electro Platers of York Inc.						199.36	0.72%	0.75%	\$64,811	\$28,272	\$93,083
Electro Tech Systems Inc.						1.00	0.00%	0.00%			D
Electroloy						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Electronic Display Systems/Hercules						224.00	0.81%	0.84%			A
Ellisco						8.36	0.03%	0.03%	\$2,718	\$1,186	\$3,903
Emeco	3.00	0.13%	0.13%	\$12,430	\$5,472	3.00	0.01%	0.01%	\$975	\$425	\$19,302
Empire Abrasive & Equipment Corp.						103.80	0.38%	0.39%	\$33,745	\$14,720	\$48,465
Erwins Crafts						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Ext -Corporal						4.00	0.01%	0.00%	\$0	\$0	B

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party.

AR000113

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
F B F Industries Inc.						130.00	0.47%	0.49%	\$42,263	\$18,436	\$60,698
Fabric Development						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Fairchild Space Systems						1.00	0.00%	0.00%			D
Fairfax Cleaners						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Far East Foods						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Fendt Finding Co., Inc.						7.00	0.03%	0.00%	\$0	\$0	B
Fergusson						5.96	0.02%	0.02%	\$1,938	\$845	\$2,783
Fischer & Porter Co/Andrews Glass	93.00	4.07%	4.16%			794.50	2.88%	2.98%			A
Fluid Power, Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Formation Inc.						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
Formosa Plastics						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Franklin Mint						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Frazer-Volpe Corporation						23.82	0.09%	0.09%	\$7,744	\$3,378	\$11,122
Frontier Chemical Waste Process						3.00	0.01%	0.01%	\$975	\$425	\$1,401
G. K. Garrett Corp.						27.45	0.10%	0.10%	\$8,924	\$3,893	\$12,817
Gala Industries						3.55	0.01%	0.01%	\$1,154	\$503	\$1,658
Gas Springs						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Gateway Terminal						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
General Electric						191.00	0.69%	0.72%	\$62,094	\$27,086	\$89,180
General Motors Corporation	5.00	0.22%	0.22%			517.00	1.87%	1.94%			A
Giles & Ransome						112.00	0.41%	0.42%	\$36,411	\$15,883	\$52,294
Giltech Inc.						7.00	0.03%	0.00%	\$0	\$0	B
Glah Bros., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Globe Solvents						66.36	0.24%	0.00%	\$0	\$0	B
Gould Inc.						68.00	0.25%	0.25%	\$22,107	\$9,643	\$31,750
Graphic Packaging Corp.						59.57	0.22%	0.22%	\$19,366	\$8,448	\$27,814
Green Tweed Co.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De minimis party.

AR000114



**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Gulf & Western						2.00	0.01%	0.01%	\$650	\$284	\$934
H & L Cleaners						3.00	0.01%	0.00%	\$0	\$0	B
H - V Industries, Inc.						151.50	0.55%	0.57%	\$49,252	\$21,485	\$70,737
H I Services Inc.						1.00	0.00%	0.00%			D
Hahn Truck Sales						9.00	0.03%	0.00%	\$0	\$0	B
Hale Pumps, Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Hamilton Precision Metals						472.06	1.71%	1.77%			A
Hamilton Technology, Inc.						1234.00	4.47%	4.62%			A
Hamilton Watch Co.	197.00	8.63%	8.81%			904.00	3.27%	3.39%			A
Handy & Harman Tube Co. Inc						229.18	0.83%	0.86%			A
Heel Co.						31.00	0.11%	0.12%	\$10,078	\$4,396	\$14,474
Herman Goldner Co. Inc.						7.09	0.03%	0.03%	\$2,305	\$1,005	\$3,310
High Energy Company						84.64	0.31%	0.32%	\$27,516	\$12,003	\$39,519
Hollingsworth						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Honeywell Instruments						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Hough/Loew Associates						1.09	0.00%	0.00%			D
Hulltronics						2.00	0.01%	0.01%	\$650	\$284	\$934
Hurst Perf.						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Imperial Specialty						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Industrial Systems Design						2.64	0.01%	0.00%	\$0	\$0	B
Iron Bound Heat Treating Co.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
J W Rex Co.	21.00	0.92%	0.94%	\$87,008	\$38,303	86.00	0.31%	0.32%	\$27,958	\$12,196	\$165,466
J & J Spill						43.00	0.16%	0.16%			C
James Spring & Wire Co.	2.00	0.09%	0.09%	\$8,286	\$3,648	113.00	0.41%	0.42%	\$36,736	\$16,025	\$64,695
Jenson, Homer						0.36	0.00%	0.00%			D
Jetshapes Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
John Evan's & Sons, Inc.						203.29	0.74%	0.76%	\$66,089	\$28,829	\$94,918

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De micromis party

AR000115

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Johnson Company						2.00	0.01%	0.01%	\$650	\$284	\$934
Johnson-Matthey						29.55	0.11%	0.11%	\$9,607	\$4,191	\$13,797
K - D Tool Manufacturing						95.00	0.34%	0.36%	\$30,884	\$13,472	\$44,357
K S M Fastening Systems Division						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
K S O Industries						12.00	0.04%	0.00%	\$0	\$0	B
Kawneer Corp.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Keystone Transformer						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Kim Manufacturing						283.00	1.03%	1.06%			A
Kosempel						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Krautkramer-Branson, Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Kulicke & Soffa						18.54	0.07%	0.07%	\$6,027	\$2,629	\$8,657
L & S Tool and Machine Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
LaFrance Corp.	12.00	0.53%	0.54%			415.00	1.50%	1.55%			A
Laminators Inc.						29.00	0.11%	0.11%	\$9,428	\$4,113	\$13,540
Lancaster Machinery Co.						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
Lavelle Aircraft Co.						189.55	0.69%	0.71%	\$61,622	\$26,881	\$88,503
Leeds & Northrop						145.72	0.53%	0.55%	\$47,373	\$20,665	\$68,038
Lightman Drum Co.						0.27	0.00%	0.00%			C
Lincoln						3.00	0.01%	0.01%	\$975	\$425	\$1,401
London Harness & Cable Co.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Lovekin Corporation						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Lowry's						2.55	0.01%	0.00%	\$0	\$0	B
M Q S Inspection Inc./Magnaflux						46.00	0.17%	0.17%	\$14,954	\$6,523	\$21,478
Mack Electric						0.27	0.00%	0.00%			D
Mack Wayne Plastics						12.00	0.04%	0.00%	\$0	\$0	B
Maico						94.04	0.34%	0.35%	\$30,572	\$13,336	\$43,908
Manorgraphics						36.84	0.13%	0.14%	\$11,977	\$5,224	\$17,201

\* Superceding 4/27/98 VRS

A *De maximus* party and does not qualify for *de minimis* settlement offer.

B Party has been identified as an orphan

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D *De minimis* party

AR000116

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Mars Electronics Inc.						110.99	0.40%	0.42%	\$36,083	\$15,740	\$51,822
Mars Money Systems						1.00	0.00%	0.00%			D
Materials Electronic Products						81.00	0.29%	0.30%	\$26,333	\$11,487	\$37,820
Matheson Instrument						20.10	0.07%	0.08%	\$6,534	\$2,850	\$9,385
Matthew International						3.00	0.01%	0.01%	\$975	\$425	\$1,401
McClarín Plastics						195.04	0.71%	0.73%	\$63,407	\$27,659	\$91,066
McGee Industries Inc.						97.00	0.35%	0.36%	\$31,534	\$13,756	\$45,290
McHugh Railroad Maint Equip Co.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Meade Packaging						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Mel Fin	7.00	0.31%	0.31%	\$29,003	\$12,768	7.00	0.03%	0.03%	\$2,276	\$993	\$45,039
Mida Development						57.50	0.21%	0.22%	\$18,693	\$8,154	\$26,847
Mida Manufacturing	8.00	0.35%	0.00%	\$0	\$0	16.00	0.06%	0.00%	\$0	\$0	B
Mitchell Specialty						20.00	0.07%	0.00%	\$0	\$0	B
Model Finishing						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Monitor Systems	4.00	0.18%	0.18%	\$16,573	\$7,296	4.00	0.01%	0.01%	\$1,300	\$567	\$25,736
Moore Products	73.00	3.20%	3.27%	\$302,456	\$133,150	73.00	0.26%	0.27%	\$23,732	\$10,352	\$469,691
Morning Call						355.00	1.29%	1.33%			A
N G K Metals						145.00	0.53%	0.54%	\$47,139	\$20,563	\$67,702
N W Controls	4.00	0.18%	0.18%			374.59	1.36%	1.40%			A
Napp Chemical						67.00	0.24%	0.25%	\$21,782	\$9,502	\$31,283
Narco Avionics						19.00	0.07%	0.07%	\$6,177	\$2,694	\$8,871
National Computer Systems						1.00	0.00%	0.00%			D
National Metal Crafters						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
National Products						1.00	0.00%	0.00%			D
National Solvents Inc.						156.00	0.57%	0.00%	\$0	\$0	B
Netzsch Inc.						110.00	0.40%	0.41%	\$35,761	\$15,599	\$51,360
Neutronics						10.00	0.04%	0.04%	\$3,251	\$1,418	\$4,669

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party

AR000117

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Ni-Chro						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Norco Finishing						11.00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
North Industrial Chemicals						60.00	0.22%	0.22%			C
North Penn Polishing & Plating						52.55	0.19%	0.20%	\$17,084	\$7,452	\$24,536
Olympic Tool & Machine Co.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Oxford Metal Products						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
P H L Inc.						2.00	0.01%	0.01%	\$650	\$284	\$934
P P & L Northern Div. S.C.						257.27	0.93%	0.96%			A
Paris Business Forms						2.00	0.01%	0.01%	\$650	\$284	\$934
Penflex Inc.	42.00	1.84%	1.88%	\$174,016	\$76,607	125.31	0.45%	0.47%	\$40,738	\$17,771	\$309,131
Penguin Industries						119.00	0.43%	0.45%	\$38,687	\$16,876	\$55,562
Penn Airborn Product						15.31	0.06%	0.06%	\$4,977	\$2,171	\$7,148
Penn Dye & Finishing						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Pennsbury Manufacturing						32.00	0.12%	0.00%	\$0	\$0	B
Pennwall Corp.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Penske V.D.A						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Pepco Manufacturing Co.						2.00	0.01%	0.01%	\$650	\$284	\$934
Peripheral Dynamics						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Perkin-Elmer						1.00	0.00%	0.00%			D
Permutit/Sybron Corp.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Peter Paul Cadbury Co.						2.00	0.01%	0.01%	\$650	\$284	\$934
Petrocon	35.00	1.53%	1.57%	\$145,013	\$63,839	35.00	0.13%	0.13%	\$11,378	\$4,963	\$225,194
Petter Engraving Inc.						2.04	0.01%	0.01%	\$663	\$289	\$952
Phila. Electric Co. Oregon Maint. Shops						34.45	0.12%	0.13%	\$11,200	\$4,885	\$16,085
Philadelphia Rust Proof Co. Inc.						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Philco Ford	6.00	0.26%	0.27%	\$24,859	\$10,944	6.00	0.02%	0.02%	\$1,951	\$851	\$38,605
Phillips & Jacob	4.00	0.18%	0.18%			4.00	0.01%	0.01%			C

\* Superseding 4/27/98 VRS

A De maximis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De minimis party

AR000118

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Photofabrication Chem & Equip						7.19	0.03%	0.03%	\$2,337	\$1,020	\$3,357
Photolastic Inc.	11.00	0.48%	0.49%	\$45,576	\$20,064	11.00	0.04%	0.04%	\$3,576	\$1,560	\$70,775
Pitman Corp.						47.00	0.17%	0.18%	\$15,280	\$6,665	\$21,945
Plate Crafters Inc.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Plymouth Tube	9.00	0.39%	0.40%			566.37	2.05%	2.12%			A
Pocono Foundry Inc.						1.00	0.00%	0.00%			D
Polysciences						184.00	0.67%	0.69%	\$59,818	\$26,094	\$85,912
Ponderosa Disposal Co.						10.00	0.04%	0.00%			C, B
Porter Instruments						228.27	0.83%	0.85%			A
Precision Arts Mfg.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Princo Instruments Inc.						79.00	0.29%	0.30%	\$25,683	\$11,203	\$36,886
Prodelin Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Pyco Inc.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Quaker City Chemicals	7.00	0.31%	0.31%			268.09	0.97%	1.00%			C, A
R & E Martin, Inc.						116.29	0.42%	0.44%			C
R C A	32.00	1.40%	1.43%	\$132,584	\$58,367	177.00	0.64%	0.66%	\$57,542	\$25,101	\$273,594
R C Kietzing						2.50	0.01%	0.01%	\$813	\$355	\$1,167
R D L Inc.						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
R. R. Donnelley & Sons, Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
Reilly Plating						430.00	1.56%	1.61%			A
Repco	9.00	0.39%	0.00%	\$0	\$0	14.00	0.05%	0.00%	\$0	\$0	B
Resource Technology Services, Inc.						473.72	1.72%	1.77%			C, A
Reynolds Cleaners						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Reynolds Metals						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Richard Hurst						4.08	0.01%	0.00%	\$0	\$0	B
S G L						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
S K F Industries Inc.						133.36	0.48%	0.50%	\$43,355	\$18,912	\$62,267

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party

AR000119

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
S P D Technologies						87.00	0.32%	0.33%	\$28,284	\$12,338	\$40,621
S P S Technologies						167.00	0.60%	0.63%	\$54,291	\$23,683	\$77,974
Sandvik, Inc.						70.90	0.26%	0.27%	\$23,049	\$10,055	\$33,104
Sanivan Labs						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Schmidt Brewery Co.						1.00	0.00%	0.00%			D
Schramm Inc.						1.00	0.00%	0.00%			D
Scotco Design Group Inc.						69.00	0.25%	0.26%	\$22,432	\$9,785	\$32,217
Scott Paper Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sermetal						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Shared Medical Systems						3.27	0.01%	0.01%	\$1,063	\$464	\$1,527
Sharples, Inc.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Shur-Kut Supply Corp.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Sikkens Co.						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Silvine						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Simco Company Inc.						4.52	0.02%	0.02%	\$1,469	\$641	\$2,110
Simon Wrecking Company Inc.	715.51	31.33%	32.00%			983.51	3.56%	3.68%			A
Simonetta Brothers						53.26	0.19%	0.00%	\$0	\$0	B
Simpson Sign Co.						16.52	0.06%	0.00%	\$0	\$0	B
Singer Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Solar Atmospheres						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Solitario						57.00	0.21%	0.00%	\$0	\$0	B
Solid State Scientific						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941
Sonic Instruments						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Specialty Castings Inc.						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Specialty Glass Products						1.00	0.00%	0.00%			D
Sperry Univac						2.00	0.01%	0.01%	\$650	\$284	\$934
Spra-Fin Inc.						72.41	0.26%	0.27%	\$23,540	\$10,269	\$33,809

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party

AR000120

**Malvern TCE Superfund Site**  
**Generator Volume Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Sprague-Griffiths Div.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Stein Seal Co.						138.00	0.50%	0.52%	\$44,863	\$19,570	\$64,434
Sterling Fleishman Co.						3.11	0.01%	0.01%	\$1,011	\$441	\$1,452
Storm Weather Products						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Sunroc Corp.	52.00	2.28%	2.33%			358.00	1.30%	1.34%			A
Suntemp Industries	9.00	0.39%	0.00%	\$0	\$0	9.00	0.03%	0.00%	\$0	\$0	B
Superior Metal Products						58.00	0.21%	0.22%	\$18,856	\$8,225	\$27,081
Superior Tube	21.00	0.92%	0.94%	\$87,008	\$38,303	71.00	0.26%	0.27%	\$23,082	\$10,069	\$158,462
Sweda/Hugin Group						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sweda/Litton						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Syntex/Star Grouping						728.00	2.83%	2.72%			A
Syntex Dental Products						115.00	0.42%	0.43%			A
Star Dental Corporation						610.00	2.21%	2.28%			A
Synthane Taylor Corp.						71.00	0.26%	0.27%	\$23,082	\$10,069	\$33,151
T R W Inc.						0.45	0.00%	0.00%			D
Techalloy Inc.						11.67	0.04%	0.04%	\$3,794	\$1,655	\$5,449
Technical Products						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Technitrol	10.00	0.44%	0.45%	\$41,432	\$18,240	10.00	0.04%	0.04%	\$3,251	\$1,418	\$64,341
Tele Dynamics						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Telegenix Inc.						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Thermoseal Glass Corporation						2.00	0.01%	0.01%	\$650	\$284	\$934
Thomson Engineering Co.	0.02	0.00%	0.00%			0.02	0.00%	0.00%			D
Transducer Systems Inc.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Trend Instruments						31.18	0.11%	0.12%	\$10,137	\$4,422	\$14,558
Troemner, Henry						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Tube Methods						1.00	0.00%	0.00%			D

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party

AR000121

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Tudor Tech Inc.						1.00	0.00%	0.00%			D
U S A Ardec						11.00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
U S Electronic Services Corp.	19.00	0.83%	0.00%	\$0	\$0	19.00	0.07%	0.00%	\$0	\$0	B
United Chem-Con Corp.						21.00	0.08%	0.00%	\$0	\$0	B
United Contamination Controls Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
USG Grouping						586.40	2.12%	2.20%			A
U S G Interiors						182.00	0.66%	0.68%			A
Floor Systems Inc.						71.40	0.26%	0.27%			A
Donn Corporation						292.00	1.06%	1.09%			A
Davey Products						41.00	0.15%	0.15%			A
Valley Forge Laboratories, Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Valley Forge Tape & Label Co.						122.36	0.44%	0.46%	\$39,779	\$17,352	\$57,131
Victualic Company of America						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Vishay Resistive Systems						241.00	0.87%	0.90%			A
Viz Manufacturing	104.00	4.55%	4.65%			819.84	2.97%	3.07%			A
Waste Conversion						104.00	0.38%	0.39%			C
Wave Energy Systems						3.00	0.01%	0.00%	\$0	\$0	B
Welding Co.						1.00	0.00%	0.00%			D
Welex Inc.						61.00	0.22%	0.23%	\$19,831	\$8,651	\$28,482
Westcode Inc.						28.22	0.10%	0.11%	\$9,174	\$4,002	\$13,176
Western Electric	139.00	6.09%	6.22%			2083.00	7.54%	7.80%			A
Westinghouse						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Wilkinson Industries						3.00	0.01%	0.00%	\$0	\$0	B
Wittronics						0.30	0.00%	0.00%			D
Woodstream Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Xynatech Inc.						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De minimis party

AR000122



**Malvern TCE / Refund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Yuasa-Exide Battery Corp.						18.13	0.07%	0.07%	\$5,894	\$2,571	\$8,465
Zenith Products Corp.						63.00	0.23%	0.24%	\$20,481	\$8,934	\$29,415
<b>De Minimis Total:</b>	<b>673.00</b>	<b>25.09%</b>	<b>23.48%</b>	<b>\$2,158,627</b>	<b>\$950,287</b>	<b>9864.37</b>	<b>35.69%</b>	<b>33.61%</b>	<b>\$2,795,132</b>	<b>\$1,219,287</b>	<b>\$7,123,333</b>
<b>Total:</b>	<b>2283.71</b>	<b>100.00%</b>	<b>100.00%</b>			<b>27608.87</b>	<b>100.00%</b>	<b>100.00%</b>			

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\* Superseding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De micromis party

**Malvern TCE Superfund Site**  
**Explanation Sheet for the Final Volumetric Ranking Summary (VRS)**

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) Final Volumetric Ranking Summary (VRS). Please refer to the example provided below for an illustration of the process used to calculate individual total payment.<sup>1</sup>

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
ABC Corporation	34	1.49 %	1.52 %	\$141,249	\$62,182	82	0.29 %	0.30 %	\$26,325	\$11,483	\$241,239

**PRP Name** = The name of the specific potentially responsible party (PRP). Subsidiaries may be listed separately from parent companies; therefore, please review the VRS in its entirety to identify company subsidiaries that may have done business with Chemclene Corporation.

**FDA Drums** = The total number for drums sent to the Site before August 1, 1975.

**FDA %** = The total number of drums sent by the PRP prior to August 1, 1975, divided by the total number of documented drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

**FDA Revised %** = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan<sup>2</sup> drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

**FDA Cost** = The FDA Revised % divided by 100 and multiplied by \$9,263,078, the total past cost<sup>3</sup> and estimated future cost associated with the FDA.

**FDA Premium** = The FDA Revised % divided by 100 and multiplied by the future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50%).

**MPA Drums** = The total number of drums received at the Site, regardless of the date, for which the PRP is responsible.

**MPA %** = The total number of drums sent by the PRP, regardless of date, divided by the total number of documented drums received by Chemclene Corporation, multiplied by 100.

**MPA Revised %** = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan drums<sup>1</sup> received by Chemclene Corporation, regardless of date, multiplied by 100.

**MPA Cost** = MPA Revised % divided by 100 and multiplied by \$8,680,799, the total past cost<sup>3</sup> and estimated future cost associated with the MPA.

**MPA Premium** = The MPA Revised % divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50%).

**Total Payment** = FDA Cost + FDA Premium + MPA Cost + MPA Premium.

<sup>1</sup> The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

<sup>2</sup> Non-orphan drums are drums for which there is either a viable generator or a viable broker/transporter.

<sup>3</sup> The total past cost for the Site as of June 17, 1997, is \$2,214,705.00. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA.

**Malvern TCE      erfund Site**  
**Broker/Transporter Volumetric Ranking Summary\***

PRP Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Broker/ Transporter Total Payment	Generator Total De Minimis Payment	Total De Minimis Payment
Continental Vanguard, Inc.						89.36	0.32%	0.33%	\$29,062	\$12,677	\$41,739	\$30,571	\$72,310
Ekdredge, Inc.						549.53	1.99%	2.06%					A
F T C Hazardous						89.91	0.33%	0.34%	\$29,240	\$12,755	\$41,996	\$0	\$41,996
Inland Pumping & Dredging Corp.						67.00	0.24%	0.00%					B
J & J Spill						115.54	0.42%	0.43%	\$37,576	\$16,391	\$53,967	\$20,085	\$74,052
Keystone-Block Transportation						723.27	2.62%	2.71%					A
Lightman Drum Co.						48.00	0.17%	0.18%	\$15,611	\$6,810	\$22,420	\$126	\$22,546
North Industrial Chemicals						24.00	0.09%	0.09%	\$7,805	\$3,405	\$11,210	\$28,025	\$39,235
P Q Corporation						67.00	0.24%	0.25%	\$21,790	\$9,505	\$31,295	\$0	\$31,295
Philadelphia Steel Drum Co. Inc.						43.00	0.16%	0.16%	\$13,984	\$6,100	\$20,085	\$0	\$20,085
Phillips & Jacob	20.00	0.88%	0.89%	\$82,865	\$36,479	20.00	0.07%	0.07%	\$6,504	\$2,837	\$128,686	\$25,804	\$154,490
Ponderosa Disposal Co.						111.00	0.40%	0.00%					B
Quaker City Chemicals	52.00	2.28%	2.33%			333.11	1.21%	1.25%					A
R & E Martin, Inc.						55.00	0.20%	0.21%	\$17,887	\$7,803	\$25,690	\$54,317	\$80,007
Resource Technology Services, Inc.						206.27	0.75%	0.77%					A
Waste Conversion						38.00	0.14%	0.14%	\$12,358	\$5,391	\$17,749	\$97,154	\$114,903
Waste Consulting & Brokerage						5.36	0.02%	0.02%	\$1,743	\$760	\$2,504	\$0	\$2,504
U.S. Environmental Services						4.00	0.01%	0.01%	\$1,301	\$567	\$1,868	\$0	\$1,868
<b>Total:</b>	<b>72.00</b>	<b>3.16%</b>	<b>3.22%</b>	<b>\$82,865</b>	<b>\$36,479</b>	<b>2589.36</b>	<b>9.38%</b>	<b>9.82%</b>	<b>\$194,861</b>	<b>\$86,001</b>	<b>\$399,289</b>	<b>\$266,082</b>	<b>\$666,291</b>

\* Superseding 4/27/98 VRS

A Party does not qualify for *de minimis* settlement offer

B Party has been identified as an orphan.

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# **Malvern TCE Volumetric Ranking Summaries/Overview and Methodology**

This document provides a general overview and describes methodology utilized by EPA in the preparation of the Malvern TCE Superfund Site ("Site") Volumetric Ranking Summaries dated November 30, 1998 ("Summaries"). A description of *de minimis* settlement eligibility and requirements also is provided.

## **I. VOLUMETRIC RANKING SUMMARIES: OVERVIEW**

The volumetric ranking summaries reflect revisions made by EPA to draft Site volumetric ranking summaries prepared by EPA and distributed to potentially responsible parties ("PRPs") for the Site on November 3, 1997 and April 30, 1998. Among other things, the attached Summaries incorporate information obtained by EPA as a result of: a) EPA's review and/or reconsideration of challenges submitted by PRPs to EPA to prior draft Site volumetric ranking summaries; b) review by EPA of Site records; and c) EPA research into the continued existence and viability of various PRPs identified in connection with the Site.

### **A. Generator and Transporter Volumetric Ranking Summaries**

EPA has prepared two volumetric ranking summaries for the Site: a Generator Volumetric Ranking Summary ("Generator VRS") and a Broker/Transporter Volumetric Ranking Summary ("Broker/Transporter VRS"). As a result of EPA's review of Site records documenting transactions between PRPs and Chemclene, a number of brokers/transporters have been identified. The Summaries are intended to reflect all generator and broker/transporter PRP transactions at the Site and to attribute to each generator and broker/transporter identified at the Site, the full volume of waste into the Site contributed by each, as reflected in Site records. All documented shipments of waste to the Site are reflected in the Generator VRS; transactions involving brokers/transporters also are reflected in the Broker/Transporter VRS. See Section II.D. of this Overview and Methodology for additional details relating to generator and broker/transporter transactions.

### **B. Information contained in Summaries**

In general, the attached Summaries provide the following for each PRP:

#### **1. The volume of waste each PRP contributed to the Site.**

This volume reflects, for each PRP, the total volume of waste, as measured in 55-gallon drum units, each PRP contributed to the Former Disposal Area ("FDA") and the Main Plant Area ("MPA") of the Site, areas used by Chemclene as part of its operations. These amount are reflected in the "FDA Drums" and the "MPA Drums" columns of the Summaries. See Section II.B.3. of this Overview and Methodology for details regarding EPA's methodology

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relating to the FDA and MPA.

2. The percentage of waste each PRP contributed to the FDA and MPA.

This percentage reflects each PRP's percentage of waste contributed to the FDA and MPA, relative to the percentage of total waste sent by all PRPs to the FDA and MPA, respectively. These percentages are reflected in the "FDA %" and "MPA %" columns of the Summaries.

3. The revised percentage of waste each PRP contributed to the FDA and MPA.

EPA has determined that some Site PRPs are no longer financially viable corporate entities, and, therefore, are Site "orphans" that will not participate in any *de minimis* settlement with EPA. These orphan shares have been apportioned on a *pro rata* basis among non-orphan Site PRPs. This apportionment is reflected in the "Revised FDA %" and "Revised MPA %" columns of the Summaries.

4. De minimis settlement payment required of each settling de minimis PRP.

The Summaries include each eligible *de minimis* PRP's share of costs such PRP will be required to pay in order to participate in a *de minimis* settlement with EPA. The total payment required of each *de minimis* PRP is reflected in the "Total Payment" column of the Summaries. The total payment required of each PRP includes each PRP's share of costs associated with the FDA and MPA, as set forth in the "FDA Cost" and "MPA Cost" columns of the Summaries. In addition, the total payment required of each PRP includes a premium payment assessed by EPA to take into account remedy and cost risks assumed by EPA in connection with the Site and the *de minimis* settlement. The premium is not assessed on EPA's past costs, but only on the estimated future costs. Premiums are reflected in the "FDA Premium" and "MPA Premium" columns of the Summaries.

See the Explanation Sheets attached to the Summaries for additional details regarding the information contained in the Summaries.

## II. **METHODOLOGY UTILIZED BY EPA WHEN CREATING THE VOLUMETRIC RANKING SUMMARIES**

### A. Documents Used

The Summaries prepared for the Site were compiled using Site documents obtained by EPA from Chemclene. These documents, which include invoices, receipts, purchase orders, manifests, and a number of other related documents, refer to transactions dating from 1968 until 1992 between Chemclene and its customers. These documents memorialize a number of

different types of transactions, reflecting the varied nature of Chemclene's business and Chemclene's changing billing practices. Examples of the transactions reflected in the documents include, but are not limited to:

1. Shipment of solvent and non-solvent waste from waste generators to Chemclene for processing and/or disposal;
2. Transshipments of solvent and non-solvent waste from Chemclene to other treatment, storage and disposal facilities;
3. Transfer of reclaimed solvents from Chemclene back to the original waste generator;
4. Transfer of raw or reclaimed solvent from Chemclene to customers;
5. Return of unused solvents or unused empty drums from customers to Chemclene;
6. Transfer of empty drums from Chemclene to waste generators to be filled up with wastes;
7. Purchases of raw materials by Chemclene;
8. Sale of services (such as waste sampling or transport services) by Chemclene to customers; and
9. Charges by Chemclene for off-Site disposal of still-bottoms resulting from the on-Site processing of wastes.

**B. Interpretation of Documents**

**1. Waste into the Site**

Based upon its understanding of Chemclene's operations, EPA has assumed that any unit of waste shipped to the Site was just as likely to have become a contaminant in the environment as any other unit of waste.

In preparing the volumetric ranking, EPA has examined carefully the Site documents to determine which transactions indicate the shipment of waste to Chemclene, and to determine the volume of these shipments.

The majority of transactions reflected in the Summaries are documented by a Chemclene invoice. In many instances, however, there are other documents that reveal the

details of the transaction more clearly than the invoice. For most transactions, the nature of the transaction is clear regardless of which document is examined. However, in some cases the nature of the transaction becomes clear only by comparing two or more documents. In all instances, EPA looked at all of the documents related to a transaction before determining how to interpret the documents.

## 2. Time Period Summarized

For purposes of preparing the VRS, EPA reviewed and summarized existing Site documents, which refer to the 1968 to 1992 time period. EPA is aware that Chemclene operations at the Site commenced in approximately 1952. However, since EPA does not have information relating to the 1952 to 1968 period of Chemclene operations, EPA has made no assumptions regarding waste transactions during that time period, and has not attempted to summarize waste transactions during that time period. Available information indicates that Chemclene withdrew its Part B Application submitted pursuant to the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6901 *et seq.*, to operate as a treatment and storage facility, and stopped accepting waste solvent for reclamation in July 1992.

## 3. Main Plant Area and Former Disposal Area

Information available to EPA indicates that Chemclene utilized both the MPA and FDA as part of Chemclene's operations. At all times during its operation, until approximately July 1992, Chemclene utilized the MPA to receive, accumulate, store, and process wastes, including hazardous substances. All wastes sent to the Site initially went to the MPA. Wastes, including hazardous substances, also were released and disposed of at the MPA as a result of Chemclene's operations. Chemclene also disposed of wastes, including hazardous substances, at the FDA. Chemclene claims that disposal at the FDA ceased when new management took over the business in approximately August 1975, at which point Chemclene discontinued use of the FDA and disposed of waste generated from the reclamation process off-Site.

Based upon the foregoing information, when preparing the volumetric ranking summaries for the Site, EPA counted all waste transactions between Chemclene and PRPs during the 1968 to August 1975 time period as waste into both the MPA and the FDA. EPA has counted waste transactions between Chemclene and PRPs after August 1, 1975, only as waste into the MPA.

The distinction between the MPA and the FDA is meaningful in two ways: a) in the setting of the cut-off delineating which PRPs may be eligible to participate in a *de minimis* settlement; and b) in determining the amount of monies eligible *de minimis* PRPs will be required to pay in order to participate in a *de minimis* settlement with EPA.

Each PRP's eligibility for *de minimis* status will be determined using the percentage of the total waste sent to the Site by the PRP. This percentage is set forth in the

"MPA %" column of the Summaries, since all waste into the Site was received and processed by Chemclene at the MPA.

The Site remedy selected by EPA in its Record of Decision dated November 26, 1997, has provided for distinct remedies for the MPA and FDA. Even though significant aspects of the cleanup of the MPA and the FDA may be combined, EPA believes that costs of the remedy can be allocated fairly between the two areas. EPA separately has calculated the *de minimis* settlement payments of each eligible *de minimis* PRPs for the MPA and FDA and has added these amounts to obtain a "Total Payment" required.

#### 4. Transshipments

Based upon EPA's understanding of Chemclene's operations and review of Site records, EPA has determined that some waste received by Chemclene at the Site likely was transhipped off-Site, e.g. shipped off-Site for processing and/or disposal. Information available to EPA indicates that Chemclene often would containerize and store at the Site these wastes for off-Site shipment at some later date, and that releases or threatened releases of these wastes at the Site occurred as a result of Chemclene's practice.

EPA did not count as waste into the Site, transactions that appear to reflect that waste was sent off-Site for processing or disposal *only* in those instances where EPA could document, typically through its review of waste manifests, that such wastes remained in their original shipping containers and were not bulk-stored or otherwise opened and handled on-Site, prior to off-Site shipment.

#### C. Units of Measurement

To the extent applicable, EPA has prepared the volumetric ranking in accordance with OSWER Directive 9835.16, "Guidance to Preparing and Releasing Waste-In Lists and Volumetric Rankings to PRPs Under CERCLA," dated February 22, 1991. The most common unit of shipment was the 55-gallon drum, and therefore all other units found in the documentation were converted to 55-gallon drum units. When units were listed in gallons or other units of volume, simple mathematics was used to convert into drum units. For those entries with less than 55 gallons, a decimal was used. For example, if the documents indicated ten 30-gallon containers of waste shipped to Chemclene, then the 300 gallons of waste would be divided into 55-gallon units yielding 5.45 drums.

In a comparatively few instances, shipments of waste were listed in units of weight or other units. In these instances EPA used the following assumptions:

- For those entries listing pounds as the measurement unit, EPA's standard conversion factor of 1 gallon = 8.33 pounds was extrapolated to 55 gallons = 458 pounds.



- 1 can = 5 gallons.
- 1 bottle = 1 gallon.
- 1 lab pack = 1 gallon.

In addition, a small number of transactions indicated the shipment to Chemclene of "empty" drums or other containers which are listed as "used" or "dirty" or some other language indicating that the container had at one time contained waste. In these instances EPA assumed that the container contained 3% of its capacity in hazardous wastes, based upon the definition of "empty" in the RCRA regulations. See 40 C.F.R. § 261.7.

#### D. Brokers/Transporters

As a result of its review of Site documents, EPA has identified a number of PRPs that appear to have acted as brokers and/or transporters of waste to the Site. EPA has included broker/transporter PRPs in the Summaries.

Most Site records that identify brokers/transporters refer to brokers/transporters with whom it appears Chemclene dealt directly. A number of Site records, for example, reflect that Chemclene directly billed and/or credited such brokers/transporters with regard to waste transactions at the Site.

The Site records that refer to broker/transporter PRPs identify two types of transactions: 1) transactions in which a broker/transporter appears to have arranged for the transport or disposal of or transported waste generated by a third-party to the Site, and in which both the broker/transporter and the generator are expressly identified in the corresponding Site record; and 2) transactions between a broker/transporter and Chemclene where no third-party generator has been identified. In the latter instance the documentation is the same as for any other generator, and the party listed on the documentation is thus treated as a generator for those transactions, even if the same party may have acted as a broker/transporter in other instances.

Consistent with OSWER Directive 9835.16, whenever a Site record reflects a transaction in which both a generator PRP and a broker/transporter PRP are expressly identified, EPA has attributed the waste volume referred to in each such transaction to both the generator and the broker/transporter for purposes of compiling waste-in information contained in the Summaries. However, EPA has counted the total waste referred to in these transactions only once for purposes of determining total waste contributed to the Site by all PRPs.

The Generator VRS summarizes waste volume information: 1) for each generator PRP; and 2) for each broker/transporter PRP only with regard to those broker/transporter transactions with Chemclene for which no corresponding third-party generator has been identified. As set forth above, in cases where a third-party generator is not identified, the party named on the

invoice or other documentation has been treated as a generator for that transaction even if the party involved has been identified as a broker/transporter for other transactions.

The total waste contributed to the Site by all PRPs appears at the end of the Generator VRS.

EPA has prepared a separate Broker/Transporter VRS in order to summarize those waste-in transactions in which both a broker/transporter and a generator have been identified. The waste volume reflected in these transactions also has been summarized for each corresponding generator in the Generator VRS. By preparing a separate Broker/Transporter VRS, EPA can attribute to each broker/transporter the waste reflected in these transactions, but avoid double-counting the waste when determining total waste contributed to the Site by all Site PRPs (as reflected in the Generator VRS).

Broker/transporter PRPs should refer to both the Generator VRS and the Broker/Transporter VRS in order to determine waste volume and percentage information.

For purposes of a *de minimis* settlement, both the generator and the broker/transporter will be liable for the full amount of the waste in a transaction involving both a generator and a broker/transporter. In other words, for some shipments two parties both will be fully liable for the share of the cleanup represented by those drums. However, parties can avoid full liability if the broker/transporter and the generator cooperate with each other and agree to an allocation between themselves. In such instances, the broker/transporter and the generator may *jointly* settle with EPA for the full amount of the wastes in question, and avoid having to *each* pay for the wastes.

#### E. Grouped PRPs

Based upon information obtained by EPA, EPA has concluded that some Site PRPs are related or successor entities to other Site PRPs. EPA has grouped related/successor entities in the attached Summaries. For each such grouping, EPA has determined the grouping's total volume and percentage liability at the Site based upon the combined totals of each related/successor entity. Total volume and percentage information for each grouping is set forth in the Generator VRS that is arranged alphabetically by PRP. Total volume and percentage information for each grouping is set forth under the name of the PRP grouping and appears in bold print. Volume and percentage information for each separate related/successor PRP member of the grouping also is set forth in the Summaries.

#### F. Orphan PRPs

When a PRP is unable to pay all or part of its allocated share of a cleanup, EPA may allocate such a share among the viable PRPs in the same ratio as other cleanup costs. Pursuant to EPA's "Orphan Share" policies, EPA, under certain circumstances, may pay (from the

Superfund) a portion of the shares of PRPs that are completely non-viable. Orphan share funding may be available only to PRPs that agree to implement and fund remedial actions at a site, and not to *de minimis* PRPs. *De minimis* PRPs may be asked to pay on a *pro rata* basis for any shares for which the orphan PRPs are unable to pay. In addition, the *de minimis* premium will take into consideration the likelihood that additional such shares will be identified subsequent to the conclusion of the *de minimis* settlement.

When EPA has been able to identify a PRP as an orphan in the attached summaries, EPA has included for each such PRP, total volume and percentage information. EPA does not anticipate that Site orphans will participate in the *de minimis* settlement or otherwise pay monies towards Site remediation. Therefore, EPA has not included payment information for any Orphan. In addition, EPA has revised each non-Orphan PRP percentage ("Revised FDA %" and "Revised MPA %"), reflecting each non-orphan PRPs *pro rata* payment share for each Site orphan.

The calculation of the revised percentages has been done on a transaction by transaction basis. If a transaction involves an orphan generator, then the transaction was checked to determine if there was a broker/transporter for the same transaction. A transaction has been divided on a *pro rata* basis among the remaining PRPs only if there is *neither* a viable generator *nor* a viable broker/transporter for the transaction.

### III. *DE MINIMIS* SETTLEMENT

#### A. *De Minimis* Cutoff

EPA has established a cut-off for *de minimis* settlement eligibility using a percentage of the total waste sent to the Site by the PRP. A PRP is eligible to participate in a *de minimis* settlement if its volumetric contribution of hazardous substances to the Site is at or less than 0.75% of the total volume attributed to the MPA. Pre-August 1975 percentages that have been assigned for the FDA have not been considered by EPA when establishing the *de minimis* settlement eligibility cutoff. However, such percentages have been considered by EPA when determining the amount of money each *de minimis* PRP will be asked to pay if it desires to settle.

EPA has also established a *de micromis* cutoff at 1.5 drums or less. EPA does not foresee a need for settlements with *de micromis* parties. EPA will, however, pursue settlements with *de micromis* parties if there is a threat of, or an actual suit by, other PRPs at the Site.

#### B. *De Minimis* Payments

The attached Summaries contain *de minimis* settlement payment information for each eligible *de minimis* settlement. EPA has divided the costs of the selected remedy, as set forth in the ROD, between the MPA and FDA, and has determined each *de minimis* PRP's required settlement payments for each of these areas of the Site. A PRP's required *de minimis* payment is

determined based upon its revised percentages for the FDA and the MPA. These revised percentages are then applied to the total costs estimates for the MPA and the FDA.

As of June 17, 1997, EPA incurred approximately \$2,214,705.00 in response costs ("Past Response Costs") at or in connection with the Site. Since EPA incurred the Past Response Costs as a result of activities that pertained to both the FDA and MPA, EPA has attributed one-half (\$1,107,352.00) of the Past Response Costs to FDA costs and the other one-half (\$1,107,352.00) to MPA costs. EPA has estimated future Site costs associated with cleanup and EPA oversight of the Site to be approximately \$15,729,151.00 (\$15,529,151.00 in remedial costs; \$200,000.00 in EPA remedial oversight). Of that amount, approximately \$8,155,725.00 has been attributed by EPA to cleanup of the FDA (\$8,055,725.00 in remedial costs; \$100,000.00 in EPA remedial oversight). Future costs associated with cleanup and EPA oversight of the MPA are approximately \$7,573,426.00. (\$7,473,426.00 in remedial costs; \$100,000.00 in EPA remedial oversight).

EPA has assessed a premium, which each *de minimis* PRP must pay in addition to each PRP's percentage of FDA and MPA costs, in order to participate in the *de minimis* settlement with EPA. The premium is intended to take into account a number of Site factors and risks, including additional remedial action and potential response cost overruns, that EPA may encounter when settling with *de minimis* PRPs. EPA has established a premium of 50% in this matter, i.e. a multiplier of .50.

**Malvern TCE Site De Minimis Offer**

# **ATTACHMENT**

# **D**

**Malvern TCE Superfund Site**  
**Explanation Sheet for the Second Round De Minimis Settlement - Volumetric Ranking Summaries**

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) New Volumetric Ranking Summary (VRS) for the Second Round *De Minimis* Settlement. This New VRS for the Second Round *De Minimis* Settlement supplants the VRS dated 11/30/98 only in reference to the parties eligible for this Second Round *De Minimis* Settlement.<sup>1</sup>

**PRP Name** = The name of the specific potentially responsible party (PRP).

**FDA Drums** = The total number of drums sent to the Site by each PRP before August 1, 1975.

**FDA %** = The total number of drums sent by the PRP to the Site prior to August 1, 1975, divided by the total number of documented drums received by Chemelene prior to August 1, 1975, multiplied by 100.

**FDA Revised %** = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan<sup>2</sup> drums received by Chemelene Corporation prior to August 1, 1975, multiplied by 100.

**FDA Cost** = The FDA Revised % divided by 100 and multiplied by \$10,544,199.49, the total past costs<sup>3</sup> and estimated future cost associated with the FDA.

**FDA Premium** = The FDA Revised % divided by 100 and multiplied by future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50% plus an additional 10% for those parties who were offered but declined to participate in the 1999 *de minimis* settlement).

**MPA Drums** = The total number of drums sent by each PRP, regardless of the date.

**MPA %** = The total number of drums sent by the PRP, regardless of date, divided by the total number of documented drums received by Chemelene Corporation, multiplied by 100.

**MPA Revised %** = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan<sup>2</sup> drums received by Chemelene Corporation, multiplied by 100.

**MPA Cost** = MPA Revised % divided by 100 and multiplied by \$9,961,900.49, the total past cost<sup>3</sup> and estimated future cost associated with the MPA.

**MPA Premium** = The MPA Revised %, divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50% plus an additional 10% for those parties who were offered but declined to participate in the 1999 *de minimis* settlement).

**Total Payment** = The sum of the FDA Cost, FDA Premium, MPA Cost, and MPA Premium.

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<sup>1</sup> The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

<sup>2</sup> Non-orphan drums are drums for which there was either a viable generator or a viable broker/transporter as of November 30, 1998.

<sup>3</sup> The total past cost for the Site as of October 3, 2000 is \$4,776,948.97. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA.

**Malvern TCE Superfund Site  
Second De Minimis Settlement  
Volumetric Ranking Summary  
(Descending)**

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
Elco Corporation	61.00	2.67%	2.73%	\$287,692	\$133,514	61.00	0.22%	0.23%	\$22,010	\$10,372	\$453,589
R & E Martin						171.29	0.62%	0.64%	\$61,805	\$29,125	\$90,931
Technitrol	10.00	0.44%	0.45%	\$47,163	\$18,240	10.00	0.04%	0.04%	\$3,608	\$1,417	\$70,428
K-D Tool Manufacturing Co						95.00	0.34%	0.36%	\$34,278	\$16,153	\$50,432
Maida Development						57.5	0.21%	0.22%	\$20,747	\$9,777	\$30,524
Boekel Industries						13.00	0.05%	0.05%	\$4,691	\$2,210	\$6,901
American Electronics Laboratories						9.00	0.03%	0.03%	\$3,247	\$1,530	\$4,778
Photofabrication Chemical & Equipment						7.19	0.03%	0.03%	\$2,594	\$1,223	\$3,817
Ervin's Crafts						5.00	0.02%	0.02%	\$1,804	\$850	\$2,654
McHugh Railroad Maint. Equip. Co.						4.00	0.01%	0.01%	\$1,443	\$680	\$2,123
<b>Total</b>	<b>71</b>					<b>432.98</b>					<b>\$716,177</b>

05/29/2001

**Malvern TCE Superfund Site  
Second Round De Minimis Settlement  
Volumetric Ranking Summary  
(Alphabetical by PRP)**

Page 1 of 1

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
American Electronics Laboratories						9.00	0.03%	0.03%	\$3,247	\$1,530	\$4,778
Boekel Industries						13.00	0.05%	0.05%	\$4,691	\$2,210	\$6,901
Elco Corporation	61.00	2.67%	2.73%	\$287,692	\$133,514	61.00	0.22%	0.23%	\$22,010	\$10,372	\$453,589
Erwins Crafts						5.00	0.02%	0.02%	\$1,804	\$850	\$2,654
K- D Tool Manufacturing						95.00	0.34%	0.36%	\$34,278	\$16,153	\$50,432
Maida Development						57.5	0.21%	0.22%	\$20,747	\$9,777	\$30,524
McHugh Railroad Maint. Equip. Co.						4.00	0.01%	0.01%	\$1,443	\$680	\$2,123
Photofabrication Chemical & Equipment						7.19	0.03%	0.03%	\$2,594	\$1,223	\$3,817
R & E Martin						171.29	0.62%	0.64%	\$61,805	\$29,125	\$90,931
Technitrol	10	0.44%	0.45%	\$47,163	\$18,240	10	0.04%	0.04%	\$3,608	\$1,417	\$70,428
<b>Total</b>	<b>71</b>					<b>432.98</b>					<b>\$716,177</b>



**Malvern TCE Site De Minimis Offer**

# **ATTACHMENT**

# **E**

# Malvern TCE Comprehensive Mailing List

## Comprehensive Mailing List (Alphabetical Order)

PAGE 1 OF 43

5/9/2001

A & J Screw Machine Products  
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Chalfont, PA 18914-2804

A & J Screw Machine Products  
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A & L Handles  
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Pottstown, PA 19464

\*\* A I W Frank

A. Duie Pyle  
Mr. Peter Latta, President  
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West Chester, PA 19382

A. Johnson & Company Incorporated  
Titanium Hearth Technologies, Inc.  
President  
215 Welsh Pool Road  
Lionville, PA 19353

A. Johnson & Company Incorporated  
Titanium Hearth Technologies, Inc.  
900 Herlock Road  
Morgantown Business Park  
Morgantown, PA 19543

A.S. Koch Corporation  
c/o Syntex Dental Corporation  
c/o Heller, Ehrman, White, & McAuliffe  
Charles M. Hungerford, Esq.  
525 University Avenue  
Palo Alto, CA 94301-1900

A.S. Koch Corporation  
c/o Syntex Dental Corporation  
c/o Langsam, Stevens, & Morris  
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A.S. Koch Corporation  
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President  
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Valley Forge, PA 19134

Accumetrics  
Mr. Paul Pitcher, President  
134 Adams Street  
Royersford, PA 19468

Accuracy Scientific  
c/o Accuracy Scientific Instruments  
Mr. Frank Kleine, President  
17 Piney Road  
Asheville, NC 29906

Accuracy Scientific  
c/o Accuracy Scientific Instruments  
Mr. Frank Kleine, President  
17 Piney Road  
Asheville, NC 29906

\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.

# Malvern TCE Comprehensive Mailing List

## Comprehensive Mailing List (Alphabetical Order)

PAGE 2 OF 43

5/9/2001

Accuracy Scientific  
c/o Quinlan et al  
Mr. Ferdinand Weiss, CEO  
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Cherry Hill, NJ 08002

Acro Labels  
Mr. Bob Reagan, President  
2531 Wyandotte Road  
Willow Grove, PA 19090

Action Manufacturing Company  
c/o Ballard, Spahr, Andrew, & Ingersoll  
Henry Weiss, Esq.  
1735 Market Street - 51st Floor  
Philadelphia, PA 19103

\*\* ADEC

Adelphia Graphic Systems (AGS)  
Ms. Paula Inforzato, Vice President  
302 Commerce Drive  
Exton, PA 19341

\*\* Agitar, Div. of Air Buensod Incorporated

Airworks  
c/o Shanley & Fisher  
Richard A. Levao, Esq.  
131 Madison Avenue  
Morristown, NJ 07962-1979

Ace Service Corporation  
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Acro Labels  
c/o Obermayer, Rebmann, Maxwell, & Hippel  
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Action Manufacturing Company  
Mr. Arthur Mattia, President  
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Adelphia Graphic Systems (AGS)  
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Doug Blazey, Esq.  
Union Meeting Corporate Center IV  
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\*\* Aero Plating

Airline Hydraulics Corporation  
Mr. Joseph Laughran, President  
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Airworks  
c/o UNC Airworks  
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101 East Orden Boulevard  
Millville, NJ 08332

\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.

# Malvern TCE Comprehensive Mailing List

## Comprehensive Mailing List (Alphabetical Order)

PAGE 3 OF 43

5/9/2001

Airworks  
c/o Dallas Airmotive  
Mr. Hugh E. McElroy, Vice President  
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Millville, NJ 08332

ALCOA  
c/o LeBoeuf, Lamb, Greene, & MacRae  
Patricia A. Shaw, Esq.  
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Alfa-Laval Separation Incorporated  
c/o Whitman, Oskerman, & Hanna  
Maria Villa, Esq.  
One Commerce Plaza  
Albany, NY 12260

Alfa-Laval Separation Incorporated  
Mr. Urkan Svensson, President  
955 Mearns Road  
Warminster, PA 18974

Amchem  
c/o Henkel Corporation  
Juliette B. Richter, Esq.  
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American Electronics Laboratories  
c/o BAE Systems  
Mr. Patrick Till, Environmental Engineer  
305 Richardson Road  
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Ametek Incorporated  
c/o Stroock & Stroock & Lavan  
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180 Maiden Lane  
New York, NY 10038

Albright Paper & Box Corporation  
Mr. Gary Gross, President  
14 Robinson Street  
Pottstown, PA 19464

ALCOA  
Mr. Ken Mcelhaeny, President  
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Lebanon, PA 17042

Alfa-Laval Separation Incorporated  
c/o Tetra-Laval  
Mr. Quinton Jackson, President  
9201 Wilnot Road  
P.O. Box 840  
Kenosha, WI 53141

Allister Manufacturing  
c/o Allstar Manufacturing  
Mr. Rob Holland, President  
451 Boot Road  
Downingtown, PA 19335

Amchem  
c/o Henkel Corporation  
Mr. Ken Arnold, Esq.  
49 Valley Drive  
Furlong, PA 18925

\*\* Ames Supply

Ametek Incorporated  
Mr. Thomas A Deeney, Director of Corporate Compliance  
37 N. Valley Drive  
Bldg 4, P.O. Box 1764  
Paoli, PA 19301-0801

\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.

# Malvern TCE Comprehensive Mailing List

## Comprehensive Mailing List (Alphabetical Order)

PAGE 4 OF 43

5/9/2001

AMF Incorporated  
c/o Minstar Incorporated  
Ms. Mary McConnell, Vice President  
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Suite 2400  
Minneapolis, MN 55452

AMP Corporation  
Mr. William Hudson, President  
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Anchor Darling Company  
c/o John A. Kennedy Jr. Law Offices  
John A. Kennedy, Jr., Esq.  
3 Radnor Corporate Center, Suite 400  
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Radnor, PA 19087

Angelo  
c/o Angelo Brothers Company  
Barton A. Pasternak, Esq., Vice President &  
General Counsel  
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Ark Products  
Mr. Ronald A. King, Vice President  
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Armstrong Cork Company  
c/o Armstrong World Industries  
Mr. George Lorch, President  
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Asplundh Manufacturing Company  
Mr. Carl Asplundh, President  
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AMP Corporation  
c/o Montgomery, McCracken, Walker, &  
Rhoades, LLP  
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123 South Broad Street  
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Amuneal Manufacturing Company  
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Anchor Darling Company  
Mr. Brian McGarvey, President  
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Antenna Corporation  
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Armstrong Cork Company  
c/o Armstrong World Industries  
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Artco Corporation  
c/o Aydin Corporation  
Mr. Gary Boswell, President  
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Asplundh Manufacturing Company  
c/o Drinker, Biddle, & Reath, LLP  
Andrew P. Foster, Esq.  
Philadelphia National Bank Building  
1345 Chestnut Street  
Philadelphia, PA 19107-3496

\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.

# Malvern TCE Comprehensive Mailing List

## Comprehensive Mailing List (Alphabetical Order)

PAGE 5 OF 43

5/9/2001

\*\* Aston-Hill Company

Athena Controls  
c/o Inductotherm Industries  
Mr. Paul Cervellero, President  
10 Indel Avenue  
Rancocas, NJ 08073

Aydin  
c/o Aydin Computer  
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Penthouse Suite  
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Balderston, Ruth  
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Malvern, PA 19355

Athena Controls  
c/o Inductotherm Industries, inc.  
James J. Himsworth, Esq.  
Masterson, Braufeld, Himsworth, &  
Maguire  
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\* Auto Pack

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# Malvern TCE Comprehensive Mailing List

## Comprehensive Mailing List (Alphabetical Order)

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5/9/2001

Beckett Corporation  
c/o Compliance Management International  
Mark C. Hammond, Esq.  
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Suite 1200  
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Beckett Corporation  
c/o Farer Fersko - Attorneys at Law  
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Beemer Engineering  
c/o Hardin, Kundia, McKeon, Poletto, &  
Polifroni  
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Springfield, NJ 07081-0730

Beemer Engineering  
c/o Beemer Precision Company Incorporated  
Mr. Harold K. Meyers, President  
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Fort Washington, PA 19034

Bendtru Company  
c/o Powers Equipment Company  
Mr. E. Robert Powers, CEO  
500 Jacksonville Road  
Hatboro, PA 19040

Bendtru Company  
Mr. Bruce J. Powers, General Manager  
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Berg Laboratories  
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Biddle Instruments Company  
c/o AVO International  
Mr. Tom Evans, President  
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Biddle Instruments Company  
c/o AVO International  
c/o Dyer Ellis & Joseph, P.C.  
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Washington, DC 20037

Bilgram Gear Company  
Mr. David Winther, President  
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West Conshohocken, PA 19428

Bishop Tube Company  
c/o Morgan, Lewis, & Brokious  
1701 Market Street  
Philadelphia, PA 19103-2921

Bishop Tube Company  
c/o Christiana Metals  
1191 McDermott Drive  
West Chester, PA 19380

Bishop Tube Company  
c/o Damascus Tube Company  
Mr. Kevin Vanzant, President  
795 Reynolds Industrial Park  
Greenville, PA 16125

\*\* Bo Peep Cleaners

\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.

**Malvern TCE Comprehensive Mailing List**  
Comprehensive Mailing List (Alphabetical Order)

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5/9/2001

Boeing  
c/o Boeing Company  
James A. King, Jr., Esq.  
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Boeing  
c/o Boeing Company  
President  
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Boekel Industries  
c/o Boekel Scientific  
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Assurance and Business Planning  
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Feasterville, PA 19053

Boyertown Packing Company  
a/k/a Hargro Flexible Packaging Corporation  
c/o Hargro Associates  
Mr. Francis C. Oatway, Vice President  
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New Canaan, CT 06840

Boyertown Packing Company  
a/k/a Hargro Flexible Packaging Corporation  
c/o Blank, Rome, Comisky & McCauley, LLP  
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Brandt Corporation  
c/o De La Rue Systems Americas Corporation  
c/o Foley & Lardner  
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Brandt Corporation  
c/o De La Rue Systems Americas Corporation  
Ms. Kathleen A. Kleinman  
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\*\* Brittany's Ltd.

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Brooks Instrument  
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Brumbaugh Industries  
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Budd Company  
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\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.



# Malvern TCE Comprehensive Mailing List

## Comprehensive Mailing List (Alphabetical Order)

PAGE 8 OF 43

5/9/2001

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Bunnell Plastics Incorporated  
c/o Furon Mickleton  
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Burroughs Corporation  
c/o Unisys Corporation  
Aria A. Klees, Esq.  
Environmental Health & Safety  
Township Line & Union Meeting  
Roads  
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Burroughs Corporation  
c/o Unisys Corporation  
Mr. James Unruh, CEO  
Township Line & Union Meeting  
Roads  
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C.K. Systematics Incorporated  
c/o Systematics Incorporated  
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Cabot Berylco Incorporated  
c/o Cabot Corporation  
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Camdel Metals  
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12244 Willow Grove Rd.  
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Cantel Incorporated  
c/o Mesiror, Gelman, Jaffe, Cramer, & Jamieson  
Mark R. Rosen, Esq.  
1735 Market Street  
Philadelphia, PA 19103-7598

\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.

# Malvern TCE Comprehensive Mailing List

## Comprehensive Mailing List (Alphabetical Order)

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5/9/2001

Cantol Incorporated  
Mr. Elmer E. Snethen, Executive Vice President  
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Philadelphia, PA 19133

Chem Cell Corporation  
Mr. Charles Tirell, President  
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Chem-Par  
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Chemclene Corporation  
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Chester County Intermediate Unit  
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Chrono-Log Corporation  
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Carvel Hall Incorporated  
c/o Syratech Incorporated  
Mr. Leonard Florence, President  
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Chem-Par  
c/o Liphatech  
Dr. Arthur A. Neathery, Vice President of  
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\* Chem-Solv

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Upper Darby, PA 19082

\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.

# Malvern TCE Comprehensive Mailing List

## Comprehensive Mailing List (Alphabetical Order)

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5/9/2001

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Classic Coachworks  
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Clifton Precision  
c/o Litton Systems Inc. Polyscientific Division  
Mr. Larry J. Ball, President  
1213 Main Street  
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Coatings For Industry Incorporated  
c/o Jerkins, Siergieji, & Smith  
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Coatings For Industry Incorporated  
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Cobra Wire & Cable Company  
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Cobra Wire & Cable Company  
c/o Fox, Rothschild, O'Brien & Frankel  
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Philadelphia, PA 19103-3291

Concurrent Computer Corporation  
c/o Crowell & Moring LLP  
R. Timothy McCrum, Esq.  
1001 Pennsylvania Avenue, NW  
Washington, DC 20004-2595

Concurrent Computer Corporation  
Ms. Karen G. Fink, Esq., Vice President &  
General Counsel  
2101 West Cypress Creek Road  
Fort Lauderdale, FL 33309

\*\* Connecticut Mixed

Container Research Corporation  
Mr. Christopher J. Pass, Industrial Engineer  
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Container Research Corporation  
c/o Fox, Rothschild, O'Brien & Frankel  
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2000 Market Street  
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Contamination Control Incorporated  
c/o Microdot Connectors  
Mr. Ernest Hartland, President  
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South Pasadena, CA 91030

\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.

# Malvern TCE Comprehensive Mailing List

## Comprehensive Mailing List (Alphabetical Order)

PAGE 11 OF 43

5/9/2001

\*\* Continental Vanguard Incorporated

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Crown Marketing Equipment Company  
President  
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CW Industries  
Mr. Kalman Lifson, President  
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Cyprus Foote Mineral Company  
c/o Cyprus Amex Mineral Company  
Mr. Milton Ward, CEO  
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91 East Mineral Circle  
Englewood, CO 80155

Danco Tool & Mold Company  
Mr. Nicholas Fagan, President  
P.O. Box 448  
Wheatland and Mellon Streets  
Phoenixville, PA 19460

Data Media Incorporated  
c/o DMC Manufacturing  
Mr. Thomas A. Rainone, President & CEO  
7025 Central Highway  
Pennsauken, NJ 08109

Davey Products  
c/o USG Interiors Incorporated  
Virginia Yang, Esq.  
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Chicago, IL 60608-4678

\*\* Control Switch

Cook Specialty Company  
Mr. Thomas A. Panzarella, President  
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Green Lane, PA 18054-0129

CSS International Corporation  
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Cyprus Foote Mineral Company  
c/o Hunton & Williams  
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New York, NY 10166-0136

Danco Tool & Mold Company  
Elliot D. Goldberg, Esq.  
420 Russell Road  
Phoenixville, PA 19460

Data Media Incorporated  
c/o Drinker, Biddle, & Reath, LLP  
Andrew P. Foster, Esq.  
Philadelphia National Bank Building  
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Philadelphia, PA 19107-3496

Davey Products  
c/o Wilbraham, Lawler, & Buba  
Kim Hollander, Esq.  
The Curtis Center  
601 Walnut Street, Suite 450 W  
Philadelphia, PA 19106-3304

David K. Robson Incorporated  
Mr. Michael Anastas, President  
738 Maryland Avenue  
Prospect Park, PA 19076

\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.

# Malvern TCE Comprehensive Mailing List

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## Comprehensive Mailing List (Alphabetical Order)

5/9/2001

De Vilbiss, Inc.  
c/o Procopio, Cory, Hargreaves, & Savitch, LLP  
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De Vilbiss, Inc.  
c/o DeVilbiss Healthcare Incorporated  
Mr. Ray Dyre, President  
P.O. Box 635  
Somerset, PA 15501

Decision Data  
c/o Decision One  
Mr. Steve Felice, President  
50 East Swedesford Road  
Frasier, PA 19355

Defense Reutilization & Marketing Service  
for DRMO Philadelphia  
c/o Eve Wilkerson-Barron, Esq.  
U. S. Department of Justice  
Environmental Defense Section  
601 D Street  
Washington, DC 20004

Defense Reutilization & Marketing Service  
for Madison, IN  
c/o Eve Wilkerson-Barron, Esq.  
U. S. Department of Justice  
Environmental Defense Section  
601 D Street  
Washington, DC 20004

Defense Reutilization & Marketing Service  
for Philadelphia Naval Shipyard  
c/o Eve Wilkerson-Barron, Esq.  
U.S. Department of Justice  
Environmental Defense Section  
601 D Street  
Washington, DC 20004

Defense Reutilization & Marketing Service  
for Picatinny Arsenal  
c/o Eve Wilkerson-Barron, Esq.  
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Environmental Defense Section  
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Washington, D.C. 20004

Defense Reutilization & Marketing Service  
for U.S. Navy Base  
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U. S. Department of Justice  
Environmental Defense Section  
601 D Street  
Washington, DC 20004

Defense Reutilization & Marketing Service  
c/o Eve Wilkerson-Barron, Esq.  
U.S. Department of Justice  
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601 D Street  
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Defense Reutilization & Marketing Service  
for DRMO Knox  
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Environmental Defense Section  
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\*\* Delaware Container Co. Inc.

Delbar Products  
Mr. Craig Benfield, Environmental Safety  
Compliance Engineer  
7th & Spruce Streets  
Perkasie, PA 18944

\*\* Delco Wire & Cable, Inc./Delco Elec.

\* Address investigation currently being conducted.

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**Malvern TCE Comprehensive Mailing List**  
Comprehensive Mailing List (Alphabetical Order)

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5/9/2001

Delmaco Manufacturing Incorporated  
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Dentronix Incorporated  
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Dettra Flag Company  
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Dettra Flag Company  
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Devon Apparel  
c/o Prentice Hall Corporation  
President  
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Display Corporation of America  
c/o TSG Merchandising Incorporated  
Mr. Paul Schmidt, President  
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Diversified Electronic Corporation  
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Diversified Electronic Corporation  
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Diversified Electronic Corporation  
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Dixon Industries Corporation  
c/o Furon Bristol  
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Dixon Industries Corporation  
c/o Environmental Law Practice  
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Dixon Industries Corporation  
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\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.

# Malvern TCE Comprehensive Mailing List

## Comprehensive Mailing List (Alphabetical Order)

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5/9/2001

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Donn Corporation  
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**\*\* Dorado Fabrics**

Drexelbrook Engineering  
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Drexelbrook Engineering  
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**\* Durawood**

**\*\* Dynamic Services**

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Enterra Instrumentation Technology  
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E/M Corporation  
c/o West Lafayette Corporation  
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East West Label Company Incorporated  
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East West Label Company Incorporated  
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East West Label Company Incorporated  
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**\* Address investigation currently being conducted.**

**\*\* Party has been identified as an orphan.**

# Malvern TCE Comprehensive Mailing List

## Comprehensive Mailing List (Alphabetical Order)

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5/9/2001

Eaton  
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Elco Corporation  
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Electro Platers of York Incorporated  
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Electroloy  
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\* Address investigation currently being conducted.

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**Malvern TCE Comprehensive Mailing List**  
Comprehensive Mailing List (Alphabetical Order)

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5/9/2001

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Ellisco  
c/o U.S. Can Company  
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Ervins Crafts  
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\* Address investigation currently being conducted.

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# Malvern TCE Comprehensive Mailing List

## Comprehensive Mailing List (Alphabetical Order)

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5/9/2001

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Fergusson  
c/o Fergusson-McKenna Supply Company  
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Floor Systems Incorporated  
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Formation Incorporated  
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Fischer & Porter Company/Andrews Glass  
Company  
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Floor Systems Incorporated  
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Fluid Power Incorporated  
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\* Address investigation currently being conducted.

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# Malvern TCE Comprehensive Mailing List

## Comprehensive Mailing List (Alphabetical Order)

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5/9/2001

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Fraser-Volpe Corporation  
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Frontier Chemical Waste Process  
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FTC Hazardous Incorporated  
c/o Fact Environmental Services  
c/o Hancock Industries  
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G. K. Garrett Corporation  
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Gala Industries  
Mr. Alan Chapman, President & CEO  
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Gala Industries  
c/o Ballard, Spahr, Andrew, & Ingersoll  
Henry Weiss, Esq.  
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Gas Springs  
c/o Stabilus Gas Spring Company  
Mr. Thomas Blomquist, President  
92 County Line Road  
Colmar, PA 18915-9607

Gas Springs  
c/o Stabilus Gas Spring Company  
Mr. Thomas H. Blomquist, President  
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Gateway Terminal  
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Gateway Terminal  
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\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.

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## Comprehensive Mailing List (Alphabetical Order)

5/9/2001

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General Electric  
c/o Lockheed Martin Missiles and Space  
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\*\* Giltech, Inc.

Glah Brothers Incorporated  
c/o Formal Affairs Incorporated  
President  
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\*\* Globe Solvents

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c/o Gould Electronics Incorporated  
c/o Obermayer, Rebmann, Maxwell, & Hippel,  
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c/o Gould Electronics Incorporated  
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Graphic Packaging Corporation  
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\*\* Party has been identified as an orphan.

# Malvern TCE Comprehensive Mailing List

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5/9/2001

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Green Tweed Company  
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Gulf & Western  
c/o Viacom International Incorporated  
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\*\* H & L Cleaners

H-V Industries Incorporated  
c/o Crown Cork & Seal Company Incorporated  
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\*\* Hahn Truck Sales

Hale Pumps Incorporated  
c/o Hale Products  
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c/o Katy Industries Incorporated  
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Hamilton Watch Company  
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Hamilton Watch Company  
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Hamilton Watch Company  
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\* Address investigation currently being conducted.

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5/9/2001

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\* Address investigation currently being conducted.

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5/9/2001

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### \*\* Inland Pumping & Dredging

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\* Address investigation currently being conducted.

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# Malvern TCE Comprehensive Mailing List

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5/9/2001

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Kawecki Berylco  
c/o Cabot Company  
Mr. Gene Lillie, President  
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Kawneer Corporation  
c/o La Bouf, Lamb, Greene & Mac Rae, LLP  
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201 Isabella Street  
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Kawneer Corporation  
Mr. Daniel Good, President  
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Keystone Block Transportation Company  
c/o Keystone Environmental Services  
Mr. Ellis Block, President  
1100 South Pottsville Pike  
Shoemakersville, PA 19555

Keystone Transformer  
Mr. Mark Fox, President  
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Blue Bell, PA 19422

Kim Manufacturing  
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Berwyn, PA 19312

\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.



# Malvern TCE Comprehensive Mailing List

## Comprehensive Mailing List (Alphabetical Order)

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5/9/2001

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Kosempel Manufacturing Company  
Mr. Paul Kosempel, President  
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Krautkramer-Branson Incorporated  
Mr. David D'Agostino, Manager -  
Environmental Affairs  
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Krautkramer-Branson Incorporated  
c/o Shaw, Pitman, Potts, & Trowbridge  
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Krautkramer-Branson Incorporated  
c/o Emerson Electric  
Mr. Charles Knight, General Manager  
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St. Louis, MO 63136

KSM Fastening Systems Incorporated  
c/o Blount International Incorporated  
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Montgomery, AL 36116-1602

Kulicke & Soffa  
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Philadelphia National Bank Building  
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Kulicke & Soffa  
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L & S Tool & Machine Company  
Mr. Terry Livingstone, President  
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LaFrance Corporation  
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Laminators Incorporated  
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Laminators Incorporated  
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Lancaster Machinery  
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Lancaster Machinery  
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Lancaster, PA 17601

Lavelle Aircraft Company  
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Philadelphia, PA 19115

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\*\* Party has been identified as an orphan.

# Malvern TCE Comprehensive Mailing List

## Comprehensive Mailing List (Alphabetical Order)

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5/9/2001

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London Harness & Cable Company  
Mr. Mark Greene, President  
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\*\* Lowry's

\*\* Mack Wayne Plastics

Malco  
c/o Microdot Connectors, Inc.  
Mr. Ernest Hartland, President  
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Mars Electronics Incorporated  
c/o Mars Electronics International  
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c/o SPX Corporation  
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c/o Pentair Corporation  
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Manorgraphics  
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Mars Money Systems  
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# Malvern TCE Comprehensive Mailing List

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5/9/2001

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McClarin Plastics  
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Mead Packaging  
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Met-Fin  
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Matthews International  
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**Malvern TCE Comprehensive Mailing List**  
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5/9/2001

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**\*\* Mida Manufacturing**

**\*\* Mida Manufacturing**

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c/o Hazardous Materials Management Team  
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Morning Call  
c/o Times Mirror Company  
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*MQS Inspection Incorporated/Magnaflux*  
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N W Controls  
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Napp Chemical  
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National Metal Crafters  
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\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.

# Malvern TCE Comprehensive Mailing List

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5/9/2001

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North Industrial Chemicals  
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North Penn Polishing & Plating  
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Olympic Tool & Machine Company  
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Olympic Tool & Machine Company  
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& Rodger  
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Oxford Metal Products  
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c/o P P & L Resources  
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P P & L Northern Division S.C.  
c/o P P & L Resources  
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Paris Business Forms  
c/o Paris Business Products  
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\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.

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5/9/2001

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Penn Airborne Products  
c/o Transacoil Incorporated  
Mr. Robert Carlson, President  
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Penn Dye & Finishing  
c/o Gold Mills Incorporated  
Mr. Nathaniel Weisler, CEO  
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Pennwalt Corporation  
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Mr. Robert McNeil, President  
Airport Industrial Mall  
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Penn Dye & Finishing  
c/o Guilford Mills, Inc.  
Mr. Terrance E. Geremski, Vice President  
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\*\* Pennsbury Manufacturing

Pennwalt Corporation  
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Pepco Manufacturing Company  
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Peripheral Dynamics  
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761 Main Avenue  
Norwalk, CT 06859-0001

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\*\* Party has been identified as an orphan.

# Malvern TCE Comprehensive Mailing List

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Permutit  
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Petrocon  
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Phila. Electric Co. Oregon Maint. Shop  
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Permutit  
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Permutit  
c/o Mayer, Day, Caldwell & Keeton  
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Peter Paul Cadbury Company  
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Mr. James L. Baldwin, Jr., Esq., Vice President  
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Dr. Pepper/Seven-Up Inc.  
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Peter Paul Cadbury Company  
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c/o Petter Company  
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\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.



# Malvern TCE Comprehensive Mailing List

## Comprehensive Mailing List (Alphabetical Order)

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5/9/2001

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Plymouth Tube  
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\* Address investigation currently being conducted.

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**Malvern TCE Comprehensive Mailing List**  
Comprehensive Mailing List (Alphabetical Order)

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5/9/2001

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# Malvern TCE Comprehensive Mailing List

## Comprehensive Mailing List (Alphabetical Order)

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5/9/2001

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Reilly Plating  
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# Malvern TCE Comprehensive Mailing List

## Comprehensive Mailing List (Alphabetical Order)

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5/9/2001

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# Malvern TCE Comprehensive Mailing List

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5/9/2001

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Mr. Richard Katz, Esq.  
51 Valley Stream Parkway  
Malvern, PA 19355-1406

### Sharples Incorporated

c/o Whiteman, Osterman, & Hanna  
Ms. Maria Villa, Esq.  
One Commerce Plaza  
Albany, NY 12260

### Sharples Incorporated

c/o Alfa-Laval Sharples  
Mr. Claes Arnegreen, CEO  
955 Mearns Road  
Warminster, PA 18974

### Shur-Kut Supply Corporation

Mr. Joe Saddic, President  
P.O. Box 119  
Morton, PA 19070

### Sikkens Company

c/o Akzo Nobel Coatings Incorporated  
Mr. Douglas W. Butler, Senior Environmental  
Affairs Manager  
4730 Crittendon Drive  
P.O. Box 37230  
Louisville, KY 40233-7230

### Silvine

Mr. Harry Silver, President  
P.O. Box 1  
Abington, PA 19001

### Simco Company Incorporated

Mr. Gary Swink, President  
2257 North Penn Road  
Hatfield, PA 19440

### Simon Wrecking Company Incorporated

c/o Kaplan & Luber, LLP  
Mr. Steven Yermish, Esq.  
Kaplan & Luber Building  
40 Darby Road  
Paoli, PA 19301-1461

### Simon Wrecking Company Incorporated

c/o Kaplan & Luber, LLP  
Ms. Sharon Morgan, Esq.  
Kaplan & Luber Building  
40 Darby Road  
Paoli, PA 19301-1461

### Simon Wrecking Company Incorporated

c/o Simon Resources, Inc.  
Mr. Samuel Simon, President  
P.O. Box 3275  
Williamsport, PA 17701

### \*\* Simonetta Brothers

### \*\* Simpson Sign Co.

### \* Singer Company North America Division

### SKF Industries Incorporated

c/o SKF USA Incorporated  
Mr. C. William McGlocklin, Director -  
Environmental Affairs  
1100 First Avenue  
King of Prussia, PA 19406

\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.

**Malvern TCE Comprehensive Mailing List**  
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5/9/2001

SKF Industries Incorporated  
c/o SKF USA Incorporated  
Mr. Timothy Gifford, General Counsel  
1111 Adams Avenue  
Norristown, PA 19403

Solar Atmospheres  
Mr. William Jones, President  
1969 Clearview Road  
Souderton, PA 18964

Solar Atmospheres  
c/o White & Williams  
Mr. Robert Toland, II, Esq.  
1800 One Liberty Place  
Philadelphia, PA 19103-7395

\*\* Solatario

Solid State Scientific  
President  
Montgomeryville Industrial Park  
Montgomeryville, PA 18936

Sonic Instruments  
f/k/a Staveley New Jersey  
Mr. Sal Busciolano  
50 Main Street  
Suite 100  
White Plains, NY 10606

Sonic Instruments  
f/k/a Staveley New Jersey  
c/o Robinson & Cole LLP  
Ms. Sharon Tarasko, Esq.  
Financial Centre  
695 E. Main Street  
Stamford, CT 06904

SPD Technologies  
c/o Obermayer, Rebmann, Maxwell & Hippel  
Mr. Daniel F. Schranghamer, Esq.  
One Penn Center, 19th Floor  
1617 John F. Kennedy Boulevard  
Philadelphia, PA 19103-1895

SPD Technologies  
Mr. Larry Colangelo, President  
13500 Roosevelt Boulevard  
Philadelphia, PA 19116

Specialty Castings Incorporated  
c/o Edwin L. Meyer Jr. Law Office  
Mr. Edwin L. Meyer, Jr., Esq.  
55 Cooper Street  
P.O. Box 448  
Woodbury, NJ 08096

Specialty Castings Incorporated  
Mr. John Cowgill, President  
42 Curtis Avenue  
Woodbury, NJ 08096

Specialty Glass Products  
Mr. Frank Arrison, President  
2885 Terwood Road  
Willow Grove, PA 19090

Sperry Univac  
c/o Unisys Corporation  
Aria A. Klees, Esq., Environmental Health &  
Safety  
Township Line & Union Meeting  
Roads  
Blue Bell, PA 19424-0001

Spra-Fin Incorporated  
President  
177 Wissahickon Avenue  
North Wales, PA 19454

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Spra-Fin Incorporated  
Mr. George H. Chittenden  
Wissahickon Avenue  
P.O. Box 1364  
North Wales, PA 19454

Sprague - Griffiths Division  
c/o Textron  
Ms. Patricia Bisshopp, Paralegal  
40 Westminster Street  
Providence, RI 02903

SPS Technologies  
Mr. James D. Dee, Vice President,  
Environmental & Legal Affairs  
101 Greenwood Avenue  
Suite 470  
Jenkintown, PA 19046

Star Dental Corporation  
c/o Den-Tal-Ez  
Mr. Charles M. Hungerford, Esq.  
c/o Heller Ehrman White & McAuliff  
525 University Avenue  
Palo Alto, CA 94301-1900

Star Dental Corporation  
c/o Den-Tal-Ez  
Mr. Carl Bretko, President  
P.O. Box 986  
Valley Forge, PA 19482

Star Dental Corporation  
c/o Den-Tal-Ez  
Mr. Mark Stevens, Esq.  
Langsam, Stevens, & Morris, LLP  
1616 Walnut Street, Suite 812  
Philadelphia, PA 19103

Stein Seal Company  
c/o Fox, Rothschild, O'Brien & Frankel  
Mr. Philip L. Hinerman, Esq.  
2000 Market Street  
Philadelphia, PA 19103-3291

Stein Seal Company  
Mr. Leon Joice, Environmental Coordinator  
1500 Industrial Boulevard  
Kulpsville, PA 19443

Sterling Fleishman Company  
Mr. Stephen Fleishman, President  
176 Pennsylvania Avenue  
Malvern, PA 19355

Storm Weather Products  
c/o Mark, Max, or Stanley Ellenberg  
222 Arlingham Road  
Flourtown, PA 19031

Sunroc Corporation  
Mr. Anthony Salamone, President  
60 Starlifter Avenue  
Dover, DE 19903

Sunroc Corporation  
c/o Hoyle, Morris & Kerr LLP  
Mr. George S. Bobnak, Esq.  
One Liberty Place  
Suite 4900  
1650 Market Street  
Philadelphia, PA 19103-7397

\*\* Suntemp Industries

Superior Metal Products  
Mr. Dennis J. Hinger, Project Engineer  
116 Berks Street  
P.O. Box 595  
Pottstown, PA 19464

\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.

# Malvern TCE Comprehensive Mailing List

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Superior Tube

Mr. William Sterrett, Jr.  
3900 Germantown Pike  
P.O. Box 159  
Collegeville, PA 19426

**\*\* Sweda/Hugin Group**

Sweda/Litton

Mr. Jill Palmer, Esq., Senior Environmental  
Counsel  
1725 Jefferson Davis Highway  
Suite 601  
Arlington, VA 22202

Syntex Dental Corporation

c/o Den-Tal-Ez  
Mr. Carl Bretko, President  
P.O. Box 896  
Valley Forge, PA 19482

Synthane Taylor Corporation

c/o Morgan, Lewis & Bockius LLP  
Mr. Frank Thomas, Esq.  
2000 One Logan Square  
Philadelphia, PA 19103-6993

Techalloy Incorporated

c/o Drinker, Biddle, & Reath, LLP  
Mr. Andrew P. Foster, Esq.  
Philadelphia National Bank Building  
1345 Chestnut Street  
Philadelphia, PA 19107-3496

Techalloy Incorporated

c/o Rahns Specialty Metals  
Mr. Henry Lopes, Vice President  
370 Franklin Turnpike  
Mahwah, NJ 07430

Technical Products

Mr. William A. Edmunds, President  
P.O. Box 904  
Hatfield, PA 19440

Superior Tube

c/o Fox, Rothschild, O'Brien & Frankel  
Mr. Philip L. Hinerman, Esq.  
2000 Market Street  
Philadelphia, PA 19103-3291

**\*\* Sweda/Hugin Group**

Syntex Dental Corporation

c/o Den-Tal-Ez  
Mr. Mark Stevens, Esq.  
c/o Langsam Stevens & Morris, LLP  
1616 Walnut Street, Suite 812  
Philadelphia, PA 19103

Syntex Dental Corporation

c/o Den-Tal-Ez  
c/o Heller Ehrman White & McAuliffe  
Mr. Charles M. Hungerford, Esq.  
525 University Avenue  
Palo Alto, CA 94301-1900

Synthane Taylor Corporation

c/o Alco Industries Incorporated  
Ms. Bette J. Walters, Vice President  
P.O. Box 937  
Valley Forge, PA 19482-0834

Techalloy Incorporated

c/o Rahns Speciality Metals  
Mr. Daniel Rico, Vice President & Chief  
Operations Officer  
Route 113  
Rahns, PA 19425-0990

Technical Products

Mr. William A. Edmunds, President  
311 North 7th Street  
Perkasie, PA 18944

\* Address investigation currently being conducted.

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# Malvern TCE Comprehensive Mailing List

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Technitrol Incorporated  
Mr. Larry Gaudino, Director of Environmental  
Services  
1003 Corporate Lande  
Export, PA 15632

\* Tele Dynamics

Telegenix Incorporated  
c/o Inductotherm Industries Incorporated  
Ms. Laura M. De Cencio  
10 Indel Avenue  
P.O. Box 157  
Rancocas, NJ 08073-0157

Telegenix Incorporated  
c/o Inductotherm Industries Incorporated  
President  
26 Olney Ave  
Cherry Hill, NJ 08003

Thermoseal Glass Corporation  
Mr. David Newman, President  
400 Water Street  
Gloucester City, NJ 08030

Thermoseal Glass Corporation  
c/o Archer, Amberson, & Griener  
Mr. Craig J. Huber, Esq.  
One Centennial Square  
P.O. Box 3000  
Haddonfield, NJ 08033-0965

Thomson Engineering Company  
President  
200 West Church Road  
King of Prussia, PA 19406

Transducer Systems Incorporated  
c/o Fox, Rothschild, O'Brien & Frankel  
Mr. Philip L. Hinerman, Esq.  
2000 Market Street  
Philadelphia, PA 19103-3291

Transducer Systems Incorporated  
c/o Xensor Company  
Dr. Mario Rafalin, President  
4000 Bridge Street  
P.O. Box 188  
Drexel Hill, PA 19026

Trend Instruments Incorporated  
c/o WIKA Instrument Corporation  
1000 Wiegard Boulevard  
Lawrenceville, GA 30043

Trend Instruments Incorporated  
Mr. Robert Trenner, President  
887 South Matlock Street  
West Chester, PA 19382

Trend Instruments Incorporated  
c/o Owens, D'Amrosio, & Nescio  
Mr. Joseph S. Nescio, Esq.  
25 South Church Street  
West Chester, PA 19382-3220

Troemner, Henry  
c/o Duane, Morris, & Heckscher  
Mr. Larry Silver, Esq.  
One Liberty Place  
Philadelphia, PA 19103-7396

Troemner, Henry  
c/o Troemner Incorporated  
Mr. Wilber Abele, President  
6825 Greenway Avenue  
Philadelphia, PA 19142

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# Malvern TCE Comprehensive Mailing List

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TRW Incorporated  
Mr. Joe Gorman, CEO  
1900 Richmond Road  
Cleveland, OH 44124

TRW Incorporated  
c/o Jones, Day, Reavis, & Pogue  
Mr. Scott D. Blackhurst, Esq.  
North Point  
901 Lakeside Avenue  
Cleveland, OH 44114

Tube Methods  
President  
Rambo & Depot Streets  
Bridgeport, PA 19405

Tudor Tech Incorporated  
c/o Inductotherm Industries Incorporated  
Mr. Edward R. Stroik, Chairman  
78 Twist Drive  
Holland, PA 18966

Tudor Tech Incorporated  
c/o Materson, Braunfeld, Himsworth, & Maguire  
Mr. James J. Himsworth, Esq.  
One Montgomery Plaza, Suite 702  
Norristown, PA 19401

\*\* U. S. Electronic Services Corporation

\* U.S. Environmental Services Incorporated

\*\* United Chem - Con Corporation

United Contamination Controls Incorporated  
Mr. Richard E. Kohler, President  
241 Zimmerman Lane  
Langhorne, PA 19047

USA Ardec  
Mr. Mark Wells, Environmental Affairs  
Route 15  
Picatinny Arsenal  
Dover, NJ 07806

USG Interiors  
c/o Wilbraham, Lawler, & Buba  
Kim Hollander, Esq.  
The Curtis Center  
601 Walnut Street, Suite 450 W  
Philadelphia, PA 19106-3304

USG Interiors  
c/o USG Interiors Incorporated  
Ms. Virginia Yang, Esq.  
125 South Franklin Street  
Chicago, IL 60608-4678

Valley Forge Laboratories Incorporated  
President  
6 Berkeley Road  
Devon, PA 19333

Valley Forge Tape & Label Company  
Mr. Paul Myers, President  
Whiteland Business Park  
119 Summit Drive  
Exton, PA 19341-2889

Victaulic Company of America  
Mr. Brian P. Bissey, Esq.  
P.O. Box 31  
Exton, PA 18044-0031

Victaulic Company of America  
Mr. D. Wayne Barefoot  
4901 Kesslersville Road  
Exton, PA 18044

\* Address investigation currently being conducted.

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# Malvern TCE Comprehensive Mailing List

## Comprehensive Mailing List (Alphabetical Order)

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Victaulic Company of America  
Mr. George Nauman, CEO  
P.O. Box 31  
Exton, PA 18044-0031

Vishay Resistive Systems  
c/o Nixon, Hargrave, Devans, & Doyle, LLP  
Ms. Jean H. McCreary, Esq.  
Clinton Square  
P.O. Box 1051  
Rochester, NY 14603

Vishay Resistive Systems  
Mr. Donald M. Clark, Environmental Affairs  
P.O. Box 27777  
Raleigh, NC 27611

Viz Manufacturing  
Mr. Victor Zelov, President  
335 East Price Street  
Philadelphia, PA 19144

Viz Manufacturing  
c/o Duane, Morris, & Heckscher  
Mr. Seth Cooley, Esq.  
One Liberty Place  
Philadelphia, PA 19103-7396

\* Waste Consulting & Brokerage Services Inc.

Waste Conversion  
c/o Republic Environmental Systems  
Incorporated  
c/o Ballard, Spahr, Andrew, & Ingersoll  
Mr. Henry Weiss, Esq.  
1735 Market Street  
51st Floor  
Philadelphia, PA 19103

Waste Conversion  
c/o Republic Environmental Systems  
Incorporated  
Mr. Michael D. Logan  
2337 North Penn Road  
Hatfield, PA 19440

\*\* Wave Energy Systems

Welding Company  
President  
P.O. Box 226  
Ardmore, PA 19003

Welex Incorporated  
Mr. Hermann Durst, Vice President, Finance  
850 Jolly Road  
Blue Bell, PA 19422

Westcode Incorporated  
Mr. Edward Widowsin, President  
14 Lee Boulevard  
Malvern, PA 19355

Westcode Incorporated  
c/o BTR  
Mr. Kevin R. Condon, Esq.  
333 Ludlow Street  
Stamford, CT 06902

Western Electric  
c/o Lucent Technologies  
Ms. Margot E. Glockner  
131 Morristown Road  
Room B2148  
Basking Ridge, NJ 07920

\* Address investigation currently being conducted.

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**Malvern TCE Comprehensive Mailing List**  
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5/9/2001

Western Electric  
c/o Lucent Technologies  
Mr. Sam I Gutter, Esq.  
c/o Sidney & Austin  
17221 I Street NW  
Washington, DC 20026

Westinghouse  
Mr. Roger E. Willis, Jr., Esq.  
11 Stanwix Street  
Pittsburgh, PA 15222

Westinghouse  
Mr. Gary Clark, President  
11 Stanwix Street  
Pittsburgh, PA 15222

\*\* Wilkinson Industries

Wittronics  
President  
RD #2  
Box 26  
Centre Hall, PA 16828

Woodstream Corporation  
Mr. Harry Whaley, President  
69 N. Locust Street  
Lititz, PA 17543-0327

Woodstream Corporation  
c/o Ecco Group, Inc.  
Ms. Linda R. Millman, Asst. General Counsel  
98 Split Brook Rd.  
Suite 102  
Nashua, NH 03062

Xyantech Incorporated  
Mr. James T Redd, President  
545 Vortex Road, Northeast  
Rio Rancho, NM 87124

Yuasa-Exide Battery Corporation  
Mr. Om P. Chopra, Director, Environmental  
Resources  
2400 Bennville Road  
Reading, PA 19605

Zenith Products Corporation  
Mr. Kim Day, President  
200 Commerce Drive  
Aston, PA 19014

Zenith Products Corporation  
c/o Masco Corporation  
Mr. Scott Halpert, Esq.  
21001 Van Borne  
Taylor, MI 48180

\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.

# **Attachment F**

# Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Boekel Industries

Invoice Date	Order Number	Invoice Number	Material	Waste Description	Quantity	Counted Towards Ranking
2/6/84	860	11873	PAA 4769026	WASTE 1,1,1 TRICHLOROETHANE	3.00	Yes
11/26/84	1165	12552	PAB 00889733	WASTE MINERAL SPIRITS	3.00	Yes
11/26/84	1166	12552	PAB 00889733	WASTE TRICHLORETHYLENE	3.00	Yes
5/7/85	956	12096	PAA 4769833	WASTE PETROLEUM NAPHTHA	1.00	Yes
1/10/86	1583	13410	PAB 00893384	WASTE TRICHLORETHYLENE	3.00	Yes
Total Waste Counted Towards Ranking					13.00	

# INVOICE

**WASTE DISPOSAL CORPORATION**  
(Solvents, Equipment & Waste Disposal)  
228 N. PHOENIXVILLE PA • MALVERN, PA 19358  
(610) 644-2888

No. 11873

SHIPPED TO

Boekel Industrial Inc.  
509 Vine St.  
Phila., Pa. 19106

Same

INVOICE DATE 2-6-84	DATE SHIPPED 2-6-84	OUR ORDER NO. 860	YOUR ORDER NO. 2704	TERMS net 30 days	F.O.B.	SALESPERSON...	SHIPPED VIA OT
3 Drs.	Waste 1,1,1-trichloroethane t removed for processing and disposal <sup>n</sup>  Material under manifest # PAA 4769026					\$65.00 Ex. Dr.	\$195.00

**PAID**  
CHECK No. 15475  
DATE 4-18-84

FOUR HERE

MANIFEST

CHEMCLENE CORPORATION

MALVERN, PA.

(215) 844-2986

P.O. # 2704

860

PAA 4769026

DATE Feb 6, 1984

GENERATOR Boekel Ind Inc. CODE

WASTE DESCRIPTION QUANTITY REMARKS

Waste Trichloroethylene 3 drums

CHEMCLENE EMPLOYEE George Dypell

AUTHORIZED SIGNATURE FOR GENERATOR [Signature]

3 DRUMS WASTE 1,1,1-TRICHLOROETHYLENE RE-MERLIN  
FOR PROCESSING DISPOSED @ 65 MC

\$195.<sup>00</sup>

DISPOSAL TREATMENT FACILITY Chemcene Corp

DATE RECEIVED 2-6-84

FACILITY EMPLOYEE [Signature]

WHITE - OFFICE

YELLOW - GENERATOR

PINK - INVOICE

GOLD - PLANT

DO NOT WRITE BELOW THIS LINE



CONTINUOUS INTERPOLED & M87 INC. D. M87S 3.014.308 3.479.827



512110152210

MEMO	INVOICE DATE	INVOICE NUMBER	AMOUNT	DISCOUNT	NET AMOUNT
M Chemclene Corporation  P/J done	2/6/84	CC11873	\$195.00		

DETACH BEFORE DEPOSITING

BOEKEL INDUSTRIES, INC.

# BOEKEL INDUSTRIES INC.

509 VINE STREET, PHILADELPHIA, PA 19106  
(215) 627-1611

PURCHASE ORDER  
SHOW ORDER NUMBER ON  
ALL INVOICES, PACKAGES  
AND SHIPPING DOCUMENTS.

ORDER NO. 2704

JOB NO. disposal of waste

DATE 2/8/84

TERMS net 30 days

SHIPPING ESTIMATE 2/6/84

Chemclene Corporation  
258 North Phoenixville Pike  
Malvern, PA 19355

SHIP  
TO

BOEKEL INDUSTRIES INC.  
509 VINE STREET  
PHILADELPHIA, PA 19106

VIA pickup via your truck  
F.O.B.

ITEM	QUANTITY	PART NO.	DESCRIPTION	UNIT PRICE	TOTAL
1	3	drums	waste trichlorethylene to be removed	\$65.00	\$195.00
CONFIRMING WITH JEFF LUPO					

SHIPPING NOTICES - Send copies to destination and address below.

PACKING SLIP - List contents and include copy in shipments sent LCL, Parcel Post, Express or Truck.

INVOICES & BILL OF LADING } Issue invoices and packing lists in DUPLICATE with original bill of lading to:

BOEKEL INDUSTRIES INC.  
509 VINE STREET  
PHILADELPHIA, PA 19106

IMPORTANT! This offer consists of the terms on the front and reverse sides hereof AND Buyer expressly limits acceptance to the terms hereof and no different or additional terms proposed by Seller shall become part of the contract.

Address

Correspondence To: BOEKEL INDUSTRIES INC.

*Dorothy Hauser*

ACKNOWLEDGEMENT MUST BE SIGNED AND RETURNED WITHIN 10 DAYS

GENERAL CONDITIONS OF PURCHASE

1. **OFFER:** This purchase order constitutes an offer by Boekel to purchase and is not an acceptance of any offer to sell the goods and any services described herein, which may be accepted only in accordance with its terms and without modifications, addition, deletion or alteration. In the event Seller's quotation sales proposal, sales order, acknowledgement, confirmation, invoice or other forms or correspondence state terms additional to, or different from those set forth herein, this purchase order shall be deemed a notification of objection to such addition and/or different terms, and a rejection thereof. The failure of Boekel to insist, in any one or more instances, upon performance of any of the terms or conditions of this order shall not be construed as waiver or relinquishment of Boekel's right to the future performance of any such term or condition, and seller's obligation in respect of such future performance shall continue in full force and effect. Prompt acceptance of this order by returning the acknowledgement copy is requested, but, in any event, any performance hereunder shall constitute an acceptance hereof and all its terms. This order and the language herein shall be construed and enforced under the Uniform Commercial Code as in effect in the State of Pennsylvania on the date hereof.
2. **ACCEPTANCE:** This order must be acknowledged immediately, and such acknowledgment shall constitute an acceptance of all terms and conditions herein contained provided, however, in the absence of such acknowledgment, any performance of the work called for in this purchase order, if accepted by Boekel constitutes an acceptance by the Seller of the terms and conditions herein provided. No counter-terms, oral or otherwise, or terms written or printed upon Seller's acknowledgment forms or invoices at variance with the terms and conditions herein, shall be effective with regard to the contract herein unless agreed to in writing by Boekel.
3. **PRICES:** Seller agrees to execute and perform this order at the prices last quoted or better if less than the price noted on the face of this order. No additional charges whatsoever with respect to any material or services performed or furnished in connection with this order or the materials to be sold hereunder shall be recognized and paid by Boekel unless they are approved in writing by the head of Boekel's Purchasing Department or an officer at Boekel and submitted to Boekel in accordance with paragraph 10 hereof, as if said additional charges constitute a change in the terms and conditions of this order. Boekel shall have the right at any time to request cost break-downs in a form satisfactory to Boekel on all items other than Seller's stock.
4. **FREIGHT:** Seller warrants that any transportation costs included in the price will not exceed those paid by Seller. If this order contains order calls for payment of any transportation costs by Boekel, purchaser shall in no event be liable or accountable for any amount in excess of the actual costs of transportation. Seller shall be accountable for, and pay any excess transportation costs arising from Seller's failure to make delivery to the F.O.B. point, or to follow shipping instructions furnished by Boekel.
5. **SHIPPING:** Unless stated otherwise, all shipments shall be made F.O.B. job site or other specified destination. Freight and transportation charges shall be prepaid. No charges shall be made for packing, storage or handling charges.
6. **DELIVERY:** Time is of the essence. Shipment must be made to meet the required date specified. On premature shipments Boekel may return the goods at Seller's expense and in any event payment will be withheld and any discount period will run from date specified by Boekel. Boekel reserves the right to cancel without charge, or to postpone deliveries of any of the goods or services covered by this order, which are not shipped in time to meet the delivery date. Seller shall not be liable for any damages suffered by Boekel due to seller's failure to deliver, if such delay is due to causes beyond the control, such as, acts of God, act of Government, act of Boekel, fire, flood, strike, sabotage, or delay in transportation and if Seller gives Boekel notice of cause, in writing within 10 days of the beginning thereof.
7. **WARRANTY:** Seller agrees to store and properly protect the equipment or material covered in this Purchase Order for a period of time as stated separately on the Purchase Order and to do this at no risk or cost to Boekel if notified of such desired shipping delay at least 10 days in advance of the scheduled shipping date. Seller is to have such equipment or material available for shipment at any time during the delay period within one week after receiving notification of new shipping date. Risk of loss shall be upon Seller, in the event of delay in shipment for reasons caused by Seller or at its request, any extra cost resulting therefrom, including but not limited to storage and extra handling, shall be paid by Seller. Seller agrees to effect and maintain insurance, including fire insurance and "extended coverage" of such type, and in such amount as to reimburse BOEKEL fully for the purchase price in case of loss or damage by fire or other hazard. Seller will furnish certificates of insurance or copies of policies when requested by BOEKEL.
8. **INSURANCE:** A. All materials, tooling, models, patterns or other personal property belonging to Boekel and furnished by Boekel to seller or otherwise in seller's custody or possession, shall be at seller's risk from loss or damage from all hazards. B. In the event that Seller is required to enter premises, owned, leased, occupied by or under the control of Boekel during the performance of services ordered hereunder or during delivery or installation of materials on articles herein contemplated or during the performance of services otherwise required to be furnished by Seller, Seller agrees that Seller will indemnify and hold harmless Boekel, its officers and employees, from any loss, cost, damage, expense or liability by reason of property damage or personal injury of whatsoever nature or kind arising from or as a result of the performance of such services and/or delivery and/or installation, whether arising out of the actions of Seller or its employees, sub-contractors or sub-subcontractors and seller agrees that it and its sub-contractors or sub-subcontractors will maintain public liability and property damage insurance in reasonable limits covering the obligations set forth above and will maintain proper workmen's compensation insurance covering all employees engaged in the performance of such services and/or delivery and/or installation.
9. **PERFORMANCE BONDS:** If required on face of Purchase Order, seller shall furnish performance or payment bonds or both, in the full amount of this order for the full performance of the work and all other obligations of seller described herein. Such bonds shall be in such form as Boekel shall prescribe and with such sureties as it shall approve.
10. **CHANGES:** If written instruction to seller, Boekel may from time to time require changes in any of the drawings or specifications for goods or work ordered hereunder, seller's failure to notify Boekel in writing within seven days after receipt of Boekel's change order shall constitute seller's agreement to conform to such change without an increase in price or extension of the time for performance.
11. **TITLE:** Unless the face of this order expressly provides otherwise, delivery shall be F.O.B. final destination, and title to and risk of loss of all the goods shall remain with Seller until delivery to unloading facilities at final destination.
12. **TAXES:** All present and future taxes, itemized or otherwise, not expressly imposed by law exclusively on Boekel are deemed to be included in and will be treated as part of the purchase price or prices payable pursuant hereto unless otherwise specified.
13. **INSPECTION:** A. Seller shall comply with all inspection and testing instructions that may be attached to this Purchase Order or contained in the specifications or drawings referred to therein. B. Boekel and Boekel's customer reserve the right to inspect at seller's or its sub-contractor's plant all items or materials and equipment ordered pursuant hereto, and to witness any testing thereof. Boekel and Boekel's customer also reserve the right to use an independent inspection agency to witness any inspection or any such tests. When Boekel's inspection is required, material or equipment shall not be packed or shipped without Boekel's written release or written waiver of inspection. C. All items of material and equipment are subject to Boekel's inspection within a reasonable time after arrival at ultimate destination. If any items of materials or equipment or any workmanship are found to be defective, inferior, or not in conformance with this purchase order, Boekel shall have the right to reject same. Neither making nor waiving inspection, nor failing to inspect or reject by Boekel shall relieve seller of its obligations, responsibilities or liabilities under this purchase order. Seller shall be solely responsible for all inspections required to comply with all applicable federal state and local laws, ordinances, regulations and manufacturer's standards.
14. **CANCELLATIONS:** Boekel reserves the right to cancel this order in its entirety or in part for any reason, however it is clearly understood that Boekel will accept negotiations by Seller for reimbursement of costs plus overhead for work to date provided that sufficient documentation is provided to justify such costs. Costs and documentation are to be provided within (10) days from date of official notice of cancellation or Boekel will deem cancellation to be at no charge.
15. **PATENTS:** Seller agrees to protect, defend and hold Boekel, our successors, assigns and customers harmless from all demands in the full use and enjoyment of all rights to inventions, machines, or devices used or applied as part of the work both in the construction or the use after completion; to pay all applicable royalties and license fees; and to indemnify Boekel and/or its customer from all judgements, suits, claims, decrees, costs, fees and expenses resulting from actual or alleged patent or copyright infringements.
16. **TERRORS:** Clerical errors shall be subject to correction.
17. **ASSIGNMENT:** No assignment of part or all of this order, including but not limited to payment, shall be valid without Boekel's prior written consent.
18. **FAIR LABOR STANDARDS ACT:** The Fair Labor Standards Act is made a part hereof and Seller shall comply with and certify on seller's invoices the following:  
"We certify that goods were produced in accordance with sections 6, 7 and 12 of F.L.S.A. as amended and with all regulations and orders issued under section 1606 of the Department of Labor".
19. **SPECIAL EMPLOYMENT OPPORTUNITY:** During the performance of this order the Seller agrees as follows:  
(1) The seller will not discriminate against any employee or applicant for employment because of race, color, religion, sex or national origin. The seller will take affirmative action to insure that applicants are employed and that employees are treated during employment without regard to their race, color, religion, sex or national origin. Such action shall include, but not be limited to the following: Employment, upgrading, demotion or transfer, recruitment, or recruitment advertising, lay-off or termination, rates of pay or other compensation and selection for training, including apprenticeship. The Seller agrees to post in conspicuous places, available to employees and applicants for employment, notices setting forth provisions of this non-discrimination clause.  
(2) The seller will in all solicitations or advertisements for employees placed by or on behalf of the seller state that all applicants will receive consideration for employment without regard to race, color, religion, sex or national origin.  
(3) The seller will send to each labor union or representative of workers with which he has a collective bargaining agreement or understanding a notice advising the labor union or workers representative of the Seller's commitments under Section 202 of Executive Order No. 11246 of September 24, 1965 and shall post copies of the notice in conspicuous places available to employees and applicants for employment.  
(4) The Seller will comply with all provisions of Executive Order 11246 of September 24, 1965 and the rules, regulations and relevant orders of the Secretary of Labor.  
(5) The Seller will furnish all information and reports required by Executive Order No. 11246 of September 24, 1965 and the rules, regulations and orders of the Secretary of Labor, or pursuant thereto, and will permit access to his books, records and accounts by the administering agency and the Secretary of Labor for purposes of investigation to ascertain compliance with such rules, regulations and orders.  
(6) In the event of the Seller's non-compliance with the non-discrimination of this order, or contract, or with any such rules, regulations or order, this order may be cancelled, amended or suspended in whole or in part and the seller shall be liable for further Government Contract or Federal assisted construction contracts in accordance with procedures authorized in Executive Order No. 11246 of September 24, 1965 and such sanctions may be imposed and remedies invoked as provided in Executive Order No. 11246 of September 24, 1965, or by rule, regulation or order of the Secretary of Labor, or otherwise provided by law.  
(7) The Seller will include the portion of the sentence immediately preceding paragraph (1) and the provisions of paragraphs (1) through (7) in every sub-contract or purchase order unless exempted by rules, regulations, or orders of the Secretary of Labor issued pursuant to Sections 204 of Executive Order No. 11246 of September 24, 1965, so that such provisions will be binding upon each sub-contractor or vendor. The Seller will take such action with respect to any sub-contract or Purchase Order as the contracting or administering agency may direct as a means of enforcing such provisions including sanctions for non-compliance. Provided, however that in the event the Seller becomes involved in, or threatened with litigation with sub-contractor or vendor as a result of such direction by the contracting or administering agency, the seller may request the United States to enter into such litigation to protect the interests of the United States.
20. **ESCALATION:** No additional charges of any kind, including charges for escalation, packing or drayage will be allowed, unless arranged for and agreed to in writing by Boekel's authorized representative at time of or prior to purchase.
21. **INSOLVENCY:** In the event of any proceedings by or against the seller voluntary or involuntary in bankruptcy or insolvency, or for the appointment of a receiver or trustee, or an assignment for the benefit of creditors of the property of the seller, or in the event of breach of any of the terms hereof, including the warranties of the seller, Boekel shall be entitled forthwith to cancel the contract resulting from the acceptance of this purchase order without liability, except for deliveries previously made.
22. **INVOICES:** On the date of shipment, or as soon as possible thereafter, forward invoices in triplicate on each order with shipping documents; i.e., original signed Bill of Lading or shipping receipt, shipping schedule, prepaid freight bill and detailed packing list (copy with shipment - Boekel copies if direct shipped to Boekel customer). Our job and order numbers must appear on invoices, shipping documents and correspondence.
23. **PAYMENT:** Due date of payment shall be computed from the date of receipt of Sellers invoice or material, whichever is the latest. By paying Seller's invoice before arrival, or complete inspection and testing of the articles at the purchaser's plant or job site, the purchaser reserves the right to make adjustments for any shortages in quantity, or for rejections. Rejected articles or materials, or any excess material quantities ordered, are returnable at Seller's risk and expense. Goods shipped to Boekel in advance of schedule may be stored by Boekel at Seller's expense or may be returned to Seller at Seller's expense, but if retained, invoices may be paid as of scheduled delivery date.
24. **WARRANTY:** Seller warrants that all of the articles and all of the materials furnished under this order are free and clear of all liens and encumbrances whatsoever and seller has a good and marketable title to same, and seller agrees to hold Boekel free and harmless against any and all claims to said merchandise. Seller further warrants that all of the articles and all of the materials furnished under this order will be free from defects in materials and workmanship, will conform to applicable specifications, drawings, samples or other descriptions given, and shall be fit and sufficient for the purpose intended, merchandise of good material and workmanship. Said express warranty shall remain in effect as to each material and each article for a period of 12 months after it is applied to a use for which it was designed not to exceed 12 months from date of shipment, except that said warranty shall be deemed to have been satisfied with respect to (a) raw materials and (b) articles of Boekel's design with respect only to conformity in design, if at the time of final inspection by Boekel in the normal course of Boekel's operations, at destination, they are not found to be defective. The foregoing period and time may be extended by written agreement and shall be deemed to be extended for such greater period of time as may be specified in Seller's standard warranty or service guarantee. The aforesaid warranty shall be in addition to any standard warranty or service guarantee given to Boekel by Seller. All warranties shall be construed as conditions as well as warranties and shall not be deemed to be exclusive. Seller shall furnish Boekel three copies of Seller's standard warranty and service guarantee, applicable to the items covered by this order. All warranties and service guarantees shall run both to Boekel and to its customers. Seller will defend and indemnify Boekel against all claims patent, trademark or copyright infringement or all unfair competition arising out of the sale, cataloging, marketing, packaging or advertisement of merchandise furnished by Seller and against all claims for damages to person or property resulting from defects in material or workmanship, or from failure of seller to comply with safety, inspection and labeling requirements of governmental agencies in force as applicable when goods are re-sold by Boekel.
25. **WHOLE AGREEMENT:** No agreements or other understandings in any way modifying the conditions of the contract resulting from acceptance of this purchase order will be binding upon Boekel unless made in writing and signed by Boekel's authorized representative.
26. **ARBITRATION:** All claims, disputes and other matters in questions arising out of, or relating to, this purchase order shall be decided by arbitration in accordance with the rules of the American Arbitration Association then obtaining unless the parties agree otherwise. This agreement to arbitrate shall be specifically enforceable under the prevailing law of the state of Pennsylvania, and the arbitration shall take place in that state. The award rendered by the arbitrators shall be final, and judgment may be entered upon it in accordance with the applicable law in any court having jurisdiction thereof. Notice of the demand for arbitration shall be filed in writing with the other party to this agreement and with the American Arbitration Association. The Seller shall proceed with the purchase order and maintain the delivery schedule during any arbitration proceedings, unless otherwise agreed by it and Boekel in writing.

# BOEKEL INDUSTRIES INC.

509 VINE STREET, PHILADELPHIA, PA 19106  
(215) 627-1611

**PURCHASE ORDER**  
SHOW ORDER NUMBER ON  
ALL INVOICES, PACKAGES  
AND SHIPPING DOCUMENTS.

ORDER NO. **2704**

JOB NO. **disposal of waste**

DATE **2/8/84**

TERMS **net 30 days**

SHIPPING ESTIMATE **2/6/84**

**Chemclene Corporation**  
**258 North Phoenixville Pike**  
**Malvern, PA 19355**

SHIP TO **BOEKEL INDUSTRIES INC.**  
**509 VINE STREET**  
**PHILADELPHIA, PA 19106**

VIA **pickup via your truck**  
F.O.B.

ITEM	QUANTITY	PART NO.	DESCRIPTION	UNIT PRICE	TOTAL
1	3	drums	waste trichlorethylene to be removed	\$65.00	\$195.00

CONFIRMING WITH JEFF BUFO

**ACKNOWLEDGEMENT**

**SHIPPING NOTICES** — Send copies to destination and address below.

**PACKING SLIP** — List contents and include copy in shipments sent LCL, Parcel Post, Express or Truck.

**INVOICES & BILL OF LADING** — Issue invoices and packing lists in DUPLICATE with original bill of lading to:

**BOEKEL INDUSTRIES INC.**  
**509 VINE STREET**  
**PHILADELPHIA, PA 19106**

**IMPORTANT!** This offer consists of the terms on the front and reverse sides hereof AND Buyer expressly limits acceptance to the terms hereof and no different or additional terms proposed by Seller shall become part of the contract.

Address

Correspondence To: **BOEKEL INDUSTRIES INC.**

**ACKNOWLEDGEMENT MUST BE SIGNED AND RETURNED WITHIN 7 DAYS** — Signed \_\_\_\_\_

### GENERAL CONDITIONS OF PURCHASE

- claims, decrees, costs, fees and expenses resulting from actual or alleged patent or copyright infringements.
16. **ERRORS:** Clerical errors shall be subject to correction.
17. **ASSIGNMENT:** NO assignment of part or all of this order including but not limited to payment, shall be valid without Bookel's prior written consent.
18. **FAIR LABOR STANDARDS ACT:** The Fair Labor Standards Act is made a part hereof and Seller shall comply with all the provisions of said Act and all the rules and regulations issued thereunder, with sections 6, 7 and 12 of F.L.S.A. as amended, and with all regulations and orders issued under section 1466 of the Department of Labor.
19. **EQUAL EMPLOYMENT OPPORTUNITY:** During the performance of this order the Seller agrees as follows:
- (1) The seller will not discriminate against any employee or applicant for employment because of race, color, religion, sex or national origin. The seller will not discriminate against any employee or applicant for employment on the basis of sex or national origin. Such action shall include, but not be limited to the following: Employment, upgrading, demotion or transfer, recruitment, or recruitment advertising, lay-off or termination, rates of pay or other compensation and selection for training, including apprenticeship. The Seller agrees to post in conspicuous places, available to employees and applicants for employment, notices setting forth provisions of this nondiscrimination clause.
- (2) The seller will in all solicitations or advertisements for employees placed by or on behalf of the seller, state that all applicants will receive consideration for employment without regard to race, color, religion, sex or national origin.
- (3) The seller will send to each labor union or representative of workers with which he has a collective bargaining agreement or understanding a notice advising the labor union or workers representative of the Seller's commitments under Section 202 of Executive Order No. 11246 of September 24, 1965 and shall post copies of the notice in conspicuous places available to employees and applicants for employment.
- (4) The Seller will comply with all provisions of Executive Order 11246 of September 24, 1965 and the rules, regulations and relevant orders of the Secretary of Labor.
- (5) The seller will furnish all information and reports required by Executive Order No. 11246 of September 24, 1965, and the rules, regulations and orders of the Secretary of Labor, or pursuant thereto, and will permit access to his books, records and accounts by the administering agency and the Secretary of Labor for purposes of investigation to ascertain compliance with such rules, regulations and orders.
- (6) In the event of the Seller's non-compliance with the non-discrimination order, or order, or contract, or with any such rule, regulations or order, this order may be converted, terminated or suspended in whole or in part and the seller declared ineligible for further Government Contracts or Federally assisted construction contracts in accordance with procedures authorized in Executive Order No. 11246 of September 24, 1965 and such sanctions may be imposed and remedies invoked as provided in Executive Order No. 11246 of September 24, 1965, or by rule, regulation or order of the Secretary of Labor, or otherwise provided by law.
- (7) The Seller will include the portion of the sentence immediately preceding paragraph (1) and the provisions of paragraphs (1) through (7) in every sub-contract or purchase order unless exempted by rules, regulations, or orders of the Secretary of Labor issued pursuant to Sections 204 of Executive Order No. 11246 of September 24, 1965, so that such provisions will be binding upon each sub-contractor or vendor. The Seller will take such action with respect to any sub-contract or Purchase Order as the contracting or administering agency may direct as a means of enforcing such provisions including sanctions for non-compliance. Provided, however that in the event the Seller becomes involved in, or is threatened with litigation by sub-contractor or vendor as a result of such direction by the contracting or administering agency, the seller may request the United States to enter into such litigation to protect the interests of the United States.
20. **ESCALATION:** No additional charges of any kind, including charges for escalation, packing or drayage will be allowed, unless arranged for and agreed to in writing by Bookel's authorized representative at time of or prior to purchase.
21. **INSOLVENCY:** In the event of any proceedings by or against the seller voluntarily or involuntarily in bankruptcy or insolvency, or for the appointment of a receiver or trustee, or an assignee for the benefit of creditors of the property of the seller, or in the event of the filing of any petition for insolvency or reorganization of the seller, Bookel shall be entitled forthwith to cancel the contract resulting from the acceptance of this purchase order without liability, except for deliveries previously made.
22. **INVOICES:** On the date of shipment, or as soon as possible thereafter, in word invoices in triplicate on each order with shipping documents; i.e., original signed Bill of Lading or shipping receipt, shipping schedule, prepaid freight bill and detailed packing list (copy with shipment - Bookel copies if direct shipped to Bookel customer). Our job and order numbers must appear on invoices, shipping documents and packing list.
23. **PAYMENT:** Due date of payment shall be computed from the date of receipt of Seller's invoice or material, whichever is the latest. By paying 50% on invoice before arrival, or complete inspection and testing of the articles at the purchaser's plant or job site, the purchaser reserves the right to make adjustments for any shortages in quantity, or for rejections. Rejected articles or materials, or any excess material quantities ordered, are returnable at Seller's risk and expense. Goods shipped to Bookel in advance of schedule may be stored by Bookel at Seller's expense or may be returned to Seller at Seller's expense, but not to be returned to Seller at the risk of Seller.
24. **WARRANTY:** Seller warrants that all of the articles are all of the exact type furnished under this order are true and clear of all liens and encumbrances whatsoever and seller has a good and marketable title to same, and seller agrees to hold Bookel free and harmless against any and all claims to said merchandise. Seller further warrants that all of the articles and all of the materials furnished under this order will be free from defects in materials and workmanship, will conform to applicable specifications, drawings, samples or other descriptions given, and shall be fit and sufficient for the purpose intended, merchandise and materials and workmanship shipped under express warranty shall remain in effect as to each material and each article for a period of 12 months after it is applied to a use for which it was designed not to exceed 18 months from date of shipment, except that said warranty shall be deemed to have been satisfied with respect to (a) raw materials and (b) articles of Bookel's design, with respect only to conformity in design, if at the time of final inspection by Bookel in the normal course of Bookel's operations, at destination, there are not found to be defective. The foregoing period and time may be extended by written agreement and permission to be extended for such greater period of time as may be specified by Seller's standard warranty ship. Said express warranty. The aforesaid warranty shall be in addition to any standard warranty or service guarantee given to Bookel by Seller. All warranties shall be construed as conditions as well as warranties and shall not be deemed to be exclusive. Seller shall furnish Bookel three copies of Seller's standard warranty and service guarantee, applicable to the items covered by this order. All warranties and service guarantees shall run both to Bookel and to its customers. Seller will defend and indemnify Bookel against all claims patent, trademark or copyright infringement on all unfair competition arising out of the catalogs, catalogues, marketing, advertising or advertisement of merchandise furnished by Seller against all claims for damages to person or property resulting from defects in material or workmanship, or from failure of seller to comply with safety, inspection and labeling requirements of governmental agencies in force as applicable when goods are re-sold by Bookel.
25. **WHOLE AGREEMENT:** No agreements or other understandings in any way modifying the conditions of the contract resulting from acceptance of this purchase order will be binding upon Bookel unless made in writing and signed by Bookel's authorized representative.
26. **ARBITRATION:** All claims, disputes and other matters in questions arising out of, or relating to, this purchase order shall be decided by arbitration in accordance with the rules of the American Arbitration Association then obtaining unless the parties agree otherwise. This agreement to arbitrate shall be specifically enforceable under the prevailing law of the state of Pennsylvania, and the arbitration shall take place in that state. The award rendered by the arbitrators shall be final, and judgment may be entered upon it in accordance with the applicable law in any court having jurisdiction thereof. Notice of the demand for arbitration shall be filed in writing with the other party to this agreement and with the American Arbitration Association. The seller shall proceed with the purchase and delivery of the goods and the delivery of the goods during any arbitration proceedings, unless otherwise agreed by it and Bookel in writing.

CHEMCLENE CORPORATION

258 N. PHOENIXVILLE PIKE  
MALVERN, PENNSYLVANIA 19355

May 9, 1985

Deborah J. Glaeser  
Boekel Industries, Inc.  
509 Vine Street  
Philadelphia, PA. 19106

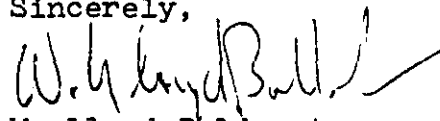
Dear Ms. Glaeser,

We have analysed your waste grinding fluid and find it to fall in the catagory of a waste water soluable oil. We can transport and dispose of this material (disposal will be solidification and landfilling in Oregon, Ohio) for a cost of \$160.00 per drum.

If you would like us to handle this waste stream for you, please let me know so that I may send you a material characterization form to fill out. Once the paperwork is completed we can pick up the waste within two days.

I look forward to hearing from you.

Sincerely,



W. Lloyd Balderston

WLB/cm



Boekel Industries, Inc.  
509 Vine Street  
Philadelphia, Pa. 19106  
(215) 627-1611

May 2, 1985

Chemclene Corporation  
258 N. Phoenixville Pike  
Malvern, PA 19355  
Attention: Lloyd

Dear Lloyd:

As per our telephone conversation of May 1, I am sending to you a sample of the mixture that we drain from our grinders. This is Cincinnati Milacron Cimcool five star 40 mixed with water and ferrous grindings.

Please analyze and quote a price on the disposal of 6-8 55 gallon drums. I am sending some literature on the Cimcool five star 40 to help you.

Regards,

Deborah J. Glaeser  
Buyer

hts

# INVOICE

12096

No.

**CHEMCLENE CORPORATION**  
 (SOLVENTS, EQUIPMENT & WASTE DISPOSAL)  
 268 N. CHOCOMACK PIKE • MALVERN, PA 19366  
 (215) 444-2988

Boekel Ind., Inc.  
 509 Vine Street  
 Phila., Pa. 19106

Same

SHIPPED TO

INVOICE DATE 5/7/54		DATE SHIPPED 5/7/54	OUR ORDER NO. 956	YOUR ORDER NO. verbal	TERMS net 30 days	F.O.B. SALES PERSON	SHIPPED VIA OT
1 Drum		Waste Petroleum Naptha removed for disposal Material under manifest # PAA 4769833 <b>PAID</b> CHECK NO. 15967 DATE 7-12-84					
		\$65.00 Ea. Dr. \$65.00					

THANK YOU

FORM NO. 64144 MAY 1954 INC. BELLMARK, N.J. 08015

FOLD HERE



MANIFEST

CHEMCLENE CORPORATION

MALVERN, PA.

(215) 644-2986

VERBAL

956

PA 4769 833

DATE May 7, 1984

GENERATOR Boekel Ind Inc CODE \_\_\_\_\_

WASTE DESCRIPTION QUANTITY REMARKS

Waste Petroleum Naphtha 1 drum

CHEMCLENE EMPLOYEE J. Dwyer

AUTHORIZED SIGNATURE FOR GENERATOR Sharon De George

1 D.P. WASTE PETROLEUM NAPHTHA REMAINS  
FOR DISPOSAL @ 651 NR

DISPOSAL TREATMENT FACILITY Chemcylene Corp

DATE RECEIVED 5-7-84

FACILITY EMPLOYEE GJD

WHITE - OFFICE  
YELLOW - GENERATOR

PINK - INVOICE  
GOLD - PLANT

DO NOT WRITE BELOW THIS LINE

MEMO	INVOICE DATE	INVOICE NUMBER	AMOUNT	DISCOUNT	NET AMOUNT
M Chemclene Corporation	5/7/84	CC12096	\$65.00		
P/J done					

DETACH BEFORE DEPOSITING

BOEKEL INDUSTRIES, INC.

# INVOICE

## CHEMCLENE CORPORATION

1000 S. Equipment & Waste Group 11  
258 N. Philadelphia Pike • WILVERN, PA 19385  
(215) 644-7988

No. 12552

SHIPPED TO

Boekel Ind. Inc.  
809 Vine St.  
Phila., Pa. 19106

Same

FOLD HERE

INVOICE DATE	DATE SHIPPED	OUR ORDER NO.	YOUR ORDER NO.	TERMS	F.O.B.	SALESPERSON	SHIPPED VIA
11/26/84	11/26/84	1155,66	verbal	net 30 day			OT
Removed for proces sing and/or disposal							
3 Drs.	Waste Mineral Spiri ts					\$65.00 Ea. Dr.	\$195.00
3 Drs.	Waste <del>MINERAL</del> Tric hloroethylene					\$65.00 Ea. Dr.	\$195.00
Material under manifest # PAB 00889733							<u>\$390.00</u>
PAID							
CHECK No. <u>19519</u>							
DATE <u>2/14/85</u>							

FORM NO. 84144, RAPIDFORMS, INC., BELLMAWR, N.J. 08031

THANK YOU

MANIFEST

CHEMCLENE CORPORATION

MALVERN, PA.

(215) 844-2986

VERBAL

1165

PAB 00889733

DATE Nov 26 1984

GENERATOR Boekel Ind Inc CODE \_\_\_\_\_

WASTE DESCRIPTION QUANTITY REMARKS

Waste Mineral Spirits 3 drums

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

CHEMCLENE EMPLOYEE M. Dwyll

AUTHORIZED SIGNATURE FOR GENERATOR Dave Miller

DISPOSAL TREATMENT FACILITY Chemcylene Corp

DATE RECEIVED 11-26-84

FACILITY EMPLOYEE GTD

WHITE - OFFICE

PINK - INVOICE

YELLOW - GENERATOR

GOLD - PLANT

DO NOT WRITE BELOW THIS LINE

CHEMCLENE CORPORATION

MILFORD, PA.

(215) 644-2886

PAG 00000000

DATE Nov 76 1984

GENERATOR Boekel Ind Inc

CODE

WASTE DESCRIPTION

QUANTITY

REMARKS

Waste Trichloroethylene

3 drums

CHEMCLENE EMPLOYEE

G. Dymally

AUTHORIZED SIGNATURE  
FOR GENERATOR

Dave Miller

EMERGENCY TREATMENT  
FACILITY

DATE RECEIVED

FACILITY NAME

WASTE TYPE  
YELLOW

ONE INVOICE:

Reimbursement for processing and disposal

disposal:

3 tons waste mineral solids @ 65/02 195.00

3 tons waste miscellaneous @ 65/02 195.00

195.00  
390.00

MEMO	INVOICE DATE	INVOICE NUMBER	AMOUNT	DISCOUNT	NET AMOUNT
M Chemclene, Corp.	11/26/84	CHEM552	\$390.00		
P/J done					

DETACH BEFORE DEPOSITING

BOEKEL INDUSTRIES, INC.

**CHEMCLINE CORPORATION**  
 (Solvents, Equipment & Waste Disposal)  
 258 N. PHOENIXVILLE PIKE • MALVERN, PA 19355  
 (215) 844-2985

No. **13410**

SHIPPED TO

General Ind. Inc.  
 100 Pine Street  
 Philadelphia, PA. 19106

Same

INVOICE DATE	DATE SHIPPED	OUR ORDER NO.	YOUR ORDER NO.	TERMS	F.O.B.	SALESPERSON	SHIPPED VIA
1/14/86	1/14/86	1583	3327	net 30			OT
3 Drs.		Removed for processing and/or disposal: Waste Trichloroethylene This material was shipped under hazardous waste manifest # PAB 00893334.				\$80.00 Ea. Dr.	\$240.00
<b>PAID</b> CHECK No. <u>21647</u> DATE <u>3/17/86</u>							

FORM NO. 64144, RAPIDFORMS, INC., BELLMAWR, NJ 08015

**THANK YOU**



MANIFEST

CHEMCLENE CORPORATION

4593

MALVERN, PA.

PO #6327

(215) 644-2985

PA-30589-384

DATE Jan 10, 1986

GENERATOR Bee Kel Ind. Inc.

CODE

WASTE DESCRIPTION

QUANTITY

REMARKS

Waste Trichlorethylene

3 drums

CHEMCLENE EMPLOYEE

AUTHORIZED SIGNATURE  
FOR GENERATOR

3 drs. @ 80/na

DISPOSAL TREATMENT  
FACILITY

DATE RECEIVED

FACILITY NAME

WHITE - OFFICE

YELLOW - GENERATOR

PINK - UNIFORM

GOLD - PLATE

DO NOT WRITE BELOW THIS LINE

MEMO	INVOICE DATE	INVOICE NUMBER	AMOUNT	DISCOUNT	NET AMOUNT
M Chemclene Corp.       P/J done	1/10/86	CHEM410	\$240.00		

DETACH BEFORE DEPOSITING

BOEKEL INDUSTRIES, INC.

**CIMCOOL**  
METALWORKING  
FLUIDS

**CIMCOOL**  
METALWORKING  
FLUIDS

**CIMCOOL**  
METALWORKING  
FLUIDS

**CIMCOOL**  
METALWORKING  
FLUIDS

**CIMCOOL**  
METALWORKING  
FLUIDS

**CIMCOOL**  
METALWORKING  
FLUIDS

**CIMCOOL**  
METALWORKING  
FLUIDS

**CIMCOOL**  
METALWORKING  
FLUIDS

**SEMI-SYNTHETIC  
METALWORKING FLUID FOR  
MODERATE-DUTY APPLICATIONS**

# **CIMCOOL FIVE STAR® 40**

## **DESCRIPTION**

CIMCOOL FIVE STAR 40 metalworking fluid is a clear, water-soluble, nitrite-free, semi-synthetic product having good rust control and excellent rancidity control.

CIMCOOL FIVE STAR 40B has the same characteristics as CIMCOOL FIVE STAR 40, but is formulated to minimize foaming in soft water.

## **APPLICATION**

For general-purpose grinding and machining operations where long cutting fluid life is needed, such as in large individual machine or central system reservoirs. Recommended for moderate-duty machining and grinding of ferrous metals, and some nonferrous metals.

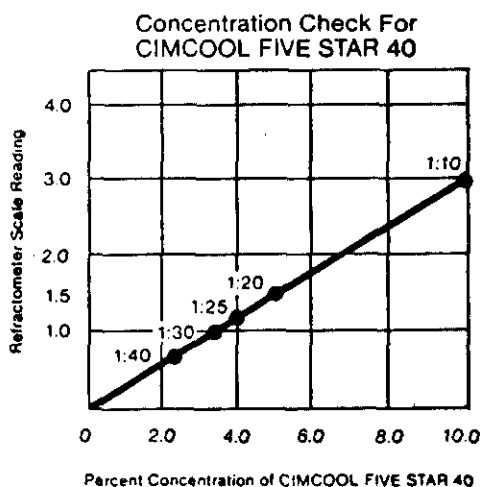
When silicones are prohibited, always use CIMCOOL FIVE STAR 40 rather than CIMCOOL FIVE STAR 40B.

**CINCINNATI  
MILACRON**

# FEATURES AND BENEFITS

- **EXCEPTIONAL RANCIDITY CONTROL** — no offensive odors; long fluid life minimizes concentrate usage and downtime spent in recharging a system.
- **EFFECTIVE LUBRICATION AND COOLING** — a combination of chemical lubricants and wetting agents provides good machining and grinding properties; keeps parts and tools cool; extends tool life; allows high speeds and feeds that increase production.
- **GOOD SETTLING PROPERTIES** — efficiently settles chips and grit; produces a good cake on positive filters which removes recirculating fines and also lowers media usage; parts and machines stay clean.
- **STABLE pH** — contributes to good rust and rancidity control; lessens the need for additives to maintain performance in difficult systems.
- **ORGANIC AND INORGANIC (NONNITRITE) CORROSION INHIBITORS** — protect machines and parts from rust.
- **PLEASANT TO USE** — no smoke; no slippery film on parts, machines or floors; low misting; mild to the skin when used as recommended; good foam control; no ammonia odors.
- **NO NITRITE**
- **STABLE** — easy to use; excellent for central systems.
- **CIMCOOL FIVE STAR 40 can be recycled for reuse by the CIMCOOL FULL CYCLE™ Module.**

**Ask your local Cincinnati Milacron Distributor for a trial today.**



## CONCENTRATION

By using the American Optical Refractometer Fluid Tester, Model 10440 or the Atago Refractometer, Model SPR-N (refer to Conversion Chart at left).



# CIMCOOL FIVE STAR 40

## RECOMMENDED STARTING DILUTIONS

Use at 1:20 (5.0%) to 1:30 (3.3%) for machining and grinding.

CIMCOOL FIVE STAR 40 is to be mixed with water for use (add concentrate to water). Add no other substances to the concentrate or mix unless approved by Cimcool Technical Services (1-800-On 2 Time, or in Ohio 1-800-582-7522).

## RECOMMENDED CIMCOOL MIX MASTER PROPORTIONER TIP SIZES

Dilution	1:20 (5.0%)	1:25 (4.0%)	1:30 (3.3%)	1:35 (2.9%)	1:40 (2.5%)	1:50 (2.0%)
Tip Size	52	54	56	58	60	62

After installation of the tip, titrate the mix to be sure the concentration is correct. Leaner dilutions may be needed for makeup.

For concentration analysis, use the Mixed Indicator (MI) Titration Procedure, the CIMCOOL "Mini" Kit II, or a refractometer.

## TYPICAL PHYSICAL AND CHEMICAL PROPERTIES

Physical state	liquid
Appearance and odor	clear; chemical
Colors available	pink, undyed, blue
Solubility in water	100%
Weight, lb/gal, 60°F (15.6°C)	8.84
Specific gravity (H <sub>2</sub> O = 1)	1.060
Boiling point, °F (°C)	212 (100)
Flash point, COC, °F (°C)	none; self-extinguishing
Fire point, COC, °F (°C)	none; self-extinguishing
Extinguishing media	no fire hazard
Unusual fire & explosion hazards	none
Freezing point (or pour point), °F, (°C)	20 (-6.7)
If frozen, thaw completely at room temperature and stir thoroughly.	
pH, concentrate	10.3
pH, 1:30 (3.3%) mix, typical operating conditions	9.0
Total chlorine/chloride, wt %, calculated	none/0.0033
Total sulfur, wt %, calculated	0.012
Phenols, phosphates, mercurials, PCB's, nitrites, PTBBA, diethanolnitrosamine, silicones	none

## PACKAGING

Available in 5-gallon pails, 55-gallon drums, Liqua Bins, and in tank truck quantities.

Do not reuse container before cleaning. After cleaning, remove label and relabel appropriately.

## DOT LABELING REQUIREMENTS

Hazardous Materials Description and Proper Shipping Name (49 CFR 172.101):	Hazard Class (49 CFR 172.101):
Not a hazardous material	Not applicable

4/29  
Betty  
Sorensen

# Product Safety Data

CIMCOOL FIVE STAR 40

## HEALTH HAZARD DATA

*Not for internal consumption.*

### Emergency and First Aid Procedures:

- Skin — Avoid prolonged contact with concentrate. Flush with water.  
Eyes — In case of contact with concentrate, flush with running water for 15 minutes. Call a physician.  
Ingestion — If concentrate is swallowed, do not induce vomiting. Dilute with water or milk. Call a physician.  
Inhalation — No first aid required; concentrate not volatile.

The following toxicity tests were conducted in accordance with the techniques specified in the Regulations for the Enforcement of the Federal Hazardous Substances Act (16 CFR 1500.3, revised 1982).

- Acute Oral Toxicity (LD<sub>50</sub> - Rats) — Above 5 g/kg (undiluted).  
Acute Inhalation Toxicity (LC<sub>50</sub> - Rats) — Above 20 mg/l for a 10% mix.  
Acute Eye Irritation (Rabbits) — Negative (undiluted); no irritative or corrosive effects.  
Primary Skin Irritation (Rabbits) — Negative (undiluted); noncorrosive and not a primary skin irritant.  
Acute Dermal Toxicity (LD<sub>50</sub> - Rabbits) — Above 2 g/kg (undiluted).  
**Additional Testing:**  
Bacterial Mutagenic (Ames) Test — Nonmutagenic.

## REACTIVITY DATA

- Stability — Stable.  
Hazardous polymerization — Will not occur.  
Incompatibility (materials to avoid) — Avoid contact of concentrate with strong acid.  
What volatile products are given off if subjected to open flame or abnormally high temperatures — Water vapor, carbon dioxide, and organic vapors.

## SPILL OR LEAK PROCEDURES

- Steps to be taken if material is released or spilled — Flush with water.  
Recommended disposal method(s) — Ultrafiltration, acid-alum-polymer chemical treatment or high temperature incineration.

## SPECIAL PROTECTION INFORMATION

- Respiratory Protection — None required.  
Ventilation — No special requirements.  
Protective Gloves — Not required.  
Eye Protection — Safety goggles recommended when handling concentrate.  
Other Protective Equipment — Normal metalworking plant protective equipment.

## SPECIAL PRECAUTIONS

- Handling and Storage — None required.  
Precautionary Labeling — See product label. Product labels for use in shop available to bulk users.

Minor formulation changes and normal variations in the manufacture of this product may cause slight variances in the data presented on this sheet.

Products Division | Cincinnati Milacron Marketing Company  
Cincinnati, Ohio 45209

PC794-6



## Office of Enforcement and Compliance Assurance **INFORMATION SHEET**

### **U.S. EPA Small Business Resources**

If you own a small business, the United States Environmental Protection Agency (EPA) offers a variety of compliance assistance and tools to assist you in complying with federal and State environmental laws. These resources can help you understand your environmental obligations, improve compliance and find cost-effective ways to comply through the use of pollution prevention and other innovative technologies.

#### **EPA Websites**

EPA has several Internet sites that provide useful compliance assistance information and materials for small businesses. Many public libraries provide access to the Internet at minimal or no cost.

EPA's Small Business Home Page (<http://www.epa.gov/sbo>) is a good place to start because it links with many other related websites. Other useful websites include:

*EPA's Home Page*  
<http://www.epa.gov>

*Small Business Assistance Programs*  
<http://www.epa.gov/ttn/sbap>

*Compliance Assistance Home Page*  
<http://www.epa.gov/oeca/oc>

*Office of Site Remediation Enforcement*  
<http://www.epa.gov/oeca/osre>

#### **Hotlines, Helplines and Clearinghouses**

EPA sponsors approximately 89 free hotlines and clearinghouses that provide convenient assistance on environmental requirements.

EPA's Small Business Ombudsman Hotline can provide a list of all the hot lines and assist in determining the hotline best meeting your needs. Key hotlines include:

**EPA's Small Business Ombudsman**  
(800) 368-5888

**Hazardous Waste/Underground Tanks/  
Superfund**  
(800) 424-9346

**National Response Center**  
(to report oil and hazardous substance spills)  
(800) 424-8802

**Toxics Substances and Asbestos Information**  
(202) 554-1404

**Safe Drinking Water**  
(800) 426-4791

**Stratospheric Ozone and Refrigerants  
Information**  
(800) 296-1996

**Clean Air Technical Center**  
(919) 541-0800

**Wetlands Hotline**  
(800) 832-7828

*Continued on back*



### Compliance Assistance Centers

In partnership with industry, universities, and other federal and state agencies, EPA has established national Compliance Assistance Centers that provide Internet and "faxback" assistance services for several industries with many small businesses. The following Compliance Assistance Centers can be accessed by calling the phone numbers below and at their respective websites:

#### Metal Finishing

(1-800-AT-NMFRC or [www.nmfrc.org](http://www.nmfrc.org))

#### Printing

(1-888-USPNEAC or [www.pneac.org](http://www.pneac.org))

#### Automotive Service and Repair

(1-888-GRN-LINK or [www.ccar-greenlink.org](http://www.ccar-greenlink.org))

#### Agriculture

(1-888-663-2155 or [www.epa.gov/oeca/ag](http://www.epa.gov/oeca/ag))

#### Printed Wiring Board Manufacturing

(1-734-995-4911 or [www.pwbr.org](http://www.pwbr.org))

#### The Chemical Industry

(1-800-672-6048 or [www.chemalliance.org](http://www.chemalliance.org))

#### The Transportation Industry

(1-888-459-0656 or [www.transource.org](http://www.transource.org))

#### The Paints and Coatings Center

(1-800-286-6372 or [www.paintcenter.org](http://www.paintcenter.org))

### State Agencies

Many state agencies have established compliance assistance programs that provide on-site and other types of assistance. Contact your local state environmental agency for more information. For assistance in reaching state agencies, call EPA's Small Business Ombudsman at (800)-368-5888 or visit the Small Business Environmental Homepage at <http://www.smallbiz-enviroweb.org/state.html>.

### Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations, businesses may be eligible for penalty waivers or reductions. EPA has two policies that potentially apply to small businesses: The Audit Policy (<http://www.epa.gov/oeca/auditpol.html>) and the Small Business Policy (<http://www.epa.gov/oeca/>

[smbusi.html](http://www.epa.gov/oeca/smbusi.html)). These do not apply if an enforcement action has already been initiated.

### Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established an ombudsman ("SBREFA Ombudsman") and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. The SBREFA Ombudsman will annually rate each agency's responsiveness to small businesses. If you believe that you fall within the Small Business Administration's definition of a small business (based on your Standard Industrial Code (SIC) designation, number of employees or annual receipts, defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247).

### Your Duty to Comply

If you receive compliance assistance or submit comments to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

***EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act (SBREFA) or related provisions.***